

## PRIVACY NOTICE

– Processing customer and business partner data –

### *2.1. Processing the personal data of customers and business partners*

1. Prior to the start of processing, the Data Subject must be notified about the processing
2. If requested, the Privacy Notice must be made available to the Data Subject
3. Management of the contracting process
4. If, after contracting, the Data Subject objects to processing, this may result in the cancellation of the agreement

## 2.1. Processing the personal data of customers and business partners

In compliance with the provisions of Act CXII of 2011 on Informational Self-Determination and Freedom of Information and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby notify you about the processing of your personal data:

### 1. The controller

Name of controller:		HESS & PARTNERS Kft.
Address of controller:		Registered office: 1052 Budapest, Deák Ferenc tér 3 (MEYER & LEVINSON floor) Branch office: HU-7622 Pécs, Siklósi út 27
Contact details of controller:	email	iroda@hessandpartners.hu
	telephone	+36 20 666 7899
	website	https://hessandpartners.hu
Name of data protection officer (if any)		-
Contact details of data protection officer		-

### 2. The data processed

#### Categories of data processed, purpose and legal basis of processing

Personal data	Purpose of processing	Legal basis for processing
Name of company's representative (if specified in the agreement)	Contracting Receipt of orders Drawing up a report in the event of defective performance Invoicing Supporting accounting processes Handling invoice payments Taking out liability insurance	Required for the performance of the agreement and compliance with legal obligations – Article 6(1) b), c) of the GDPR

#### Duration of processing (storage):

8 years
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#### Is profiling performed during processing?

Answer	Possibility	Clear and concise description of profiling
Yes		
No	<b>x</b>	

#### Is automated decision-making involved in processing?

Answer	Possibility	Clear and concise description of automated decision-making
Yes		
No	<b>x</b>	

*If yes, the Data Subject has the right to request manual, human intervention.*

**Source of personal data processed:**

The data subject
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**Data are transferred to:**

Category	Answer	Company name, registered office, activity
<i>Processors (entities performing the technical tasks relating to processing operations)</i>	<b>x</b>	<p>CIB Bank Zrt. 1027 Budapest, Medve utca 4–14 Bank account management</p> <p>DHL Magyarország Kft. Budapest, BUD International Airport, Terminal 1, DHL Express Building 302, H-1185. Customs clearance, shipping</p> <p>Fedex Magyarország Kft. 2220 Vecsés, Lőrinci út 59. C. ép. 5 Customs clearance, shipping</p> <p>Infocomplex Bt. 7632 Pécs, Littke J. u. 21 Systems administration provider</p> <p>KBOSS.hu Kft., H-1031 Budapest, Záhony utca 7/C, szamlazz.hu account</p> <p>Magyar Telekom Nyrt. 1097 Budapest, Könyves Kálmán krt. 36 Provision of corporate cable internet.</p> <p>Meyer Levinson Accounting Kft 1052 Budapest, Deák Ferenc tér 3. II. emelet. Accounting, payroll, registered office services</p> <p>Microsoft Ireland Operations Ltd. One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521/Microsoft Corporation, 15010 NE 36th Street, Microsoft Campus Building 92, Redmond, WA 98052, MS Office365 provider</p> <p>MiniCRM Zrt. 1075 Budapest, Madách Imre út 13-14 Partner registration software</p> <p>Telenor Magyarország Zrt. 2045 Törökbálint, Pannon út 1 Management of company telephone fleet.</p>
<i>Recipients</i>	<b>x</b>	<p>Dr. Áron Fejér 7621 Pécs, Irgalmasok u. 24 Legal representation</p> <p>Magyar Posta Zrt. 1138 Budapest, Dunavirág utca 2-6 Delivery of mail and packages</p> <p>NQS Consulting Kft. 7626 Pécs, Major utca 4 Certification of quality management system.</p> <p>FoxPost Zrt. 3200 Gyöngyös, Batsányi János utca 9 FoxPost Zrt. 3200 Gyöngyös, Batsányi János utca 9 Delivery of mail and packages to addresses and parcel lockers</p> <p>Magyar Posta Zrt. 1138 Budapest, Dunavirág utca 2-6 Delivery of mail and packages</p>
<i>To third (non-EU) countries</i>	<b>x</b>	<p>Microsoft Ireland Operations Ltd. One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521/Microsoft Corporation, 15010 NE 36th Street, Microsoft Campus Building 92, Redmond, WA 98052, MS Office365 provider</p>

**There is joint processing performed:**

Answer	Possibility	Clear and concise description of joint processing
Yes		
No	<b>x</b>	

Name of joint controller	Registered office
Not relevant	

### Access to data and data security measures:

Restriction of access	Documentation containing personal data is handled with appropriate security measures in place, and the scope of persons authorised for access is restricted. In the context of company processes, documentation containing personal data is stored separately in a structured system. Hardcopy documentation is stored in a lockable office. The office is equipped with an alarm system for property protection and personal safety purposes.
Data security measure	A business email system is used in the data processing process. Cloud-based storage is protected by access right management and password protection. Data are transferred to controllers via this platform. The network is protected by virus protection and firewalls. Security backups are made at regular intervals. Personal data are stored in a structured system, in the software used by the company. Central password and access right management is in place.

### 3. The rights of the Data Subject:

The rights of the Data Subject relating to the legal basis, and the explanation thereof
Right to request and receive information – The Data Subject has the right to request and receive information on the method of personal data processing prior to the start of processing Right to rectification – The Data Subject has the right to request the rectification of personal data, if the personal data stored at the controller are untrue or incorrect and they can prove this Right to access – The Data Subject has the right to request from the controller the personal data stored concerning the Data Subject Right to data portability – The Data Subject has the right to request the personal data stored concerning them in digital in a table form Right to review automated decision-making – The Data Subject has the right to request the manual review of all processing processes where the Controller has used automated decision-making with legal effect concerning the Data Subject.

### 4. Lodging complaints

The data subject has the right to lodge complaints with the data protection authority.

The Data Subject may turn to the Hungarian National Authority for Data Protection and Freedom of Information

<b>Name</b>	Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
<b>Registered office</b>	1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1374 Budapest, Pf.: 603.
<b>Email</b>	ugyfelszolgalat@naih.hu
<b>Telephone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	https://naih.hu

## 5. Legal remedy

The provisions on legal remedy are set out in Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

If the data subject has objected to processing, the controller investigates the objection within the shortest time possible from the submission of such request, but within 15 days at the latest, makes a decision on the substantiation of the request and informs the applicant of the decision in writing. If the data subject does not agree with the decision made by the controller, or if the controller fails to observe the above due date, the data subject has the right to turn to the court within 30 days of the communication of the decision or from the deadline specified.

In the event of the violation of their rights or in the above cases, the data subject may file action with a court against the controller. The court proceeds in the action as a matter of urgency. Alternatively, such proceedings may also be brought before the court competent according to the data subject's residence or place of stay. Entities or persons that otherwise have no legal capacity may also be parties to the court action. The data protection authority may intervene in the proceedings in the interest of a ruling in the data subject's favour.

The controller shall compensate for any and all damage caused by the unlawful processing of the data subject's data or a breach of the data security requirements. If the controller violates the data subject's rights to personality through the unlawful processing of the data subject's data or a breach of the data security requirements, the data subject may claim compensation from the controller. The controller is also liable for damage caused to the data subject by the processor, and the controller shall also pay the data subject compensation for any breach of the data subject's personal rights by the processor. The controller is released from the liability for the damage caused and the obligation to pay compensation for personality rights breach if the controller can prove that the damage was caused or the data subject's personal rights were violated due to a cause beyond its reasonable control and the scope of processing. The damage shall not be paid and no compensation may be claimed if the damage was caused or the violation of rights caused by the violation of the personality rights arose from the wilful misconduct or gross negligence of the data subject.