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# SOCWISE Ltd.

## Personal Data Protection Policy

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## 1 Purpose of the Personal Data Protection Policy

We are pleased for your interest in our company's Personal Data Protection Policy. Protecting your personal data is very important for us, thus we provide details on our data management below. You may gain information about your data management rights, decision options, and our company's privacy and data management responsibilities, rights and actions.

Whenever you contact us for any reason, you acknowledge that certain personal information related to the nature of the contact will be handled in accordance with this Policy. Regarding the use of our website, please note that this Policy applies only to websites operated by SOCWISE Ltd. (hereinafter referred to as Data Controller) and does not apply to other websites managed and operated by third parties, for example those referenced by [www.socwise.eu](http://www.socwise.eu).

At the same time, this Policy covers the current users of [www.socwise.eu](http://www.socwise.eu), as well as the people applying for the job openings of Data Controller People applying for any job opening (hereinafter referred to as Applicant - and at the same time User) voluntarily consent Data Controller (SOCWISE Ltd., 1145 Budapest, Róna utca 120-122., company registration number: 01 09 356167, , hereinafter also referred to as Data Controller) to manage the personal data provided during the application in accordance with this Personal Data Protection Policy. The purpose of data management is to select and contact jobseekers.

The purpose of this document is to describe the applied and functioning data protection rules, procedures and protection measures of SOCWISE Ltd. as a data controller applicable to personal data. At the same time, the Data Controller informs its customers, partners and any natural or legal person who are in contact with the Data Controller - from any legal point of view - and are involved in the processing of personal data, about the rules of handling managed personal data, the applied protection and data management procedures.

The visitor (hereinafter also referred to as User) of the Data Controller's website and sub-pages available on [www.socwise.eu](http://www.socwise.eu) (hereinafter also referred to as the Website), acknowledges, accepts and agrees that Data Controller manages the technical user data (such as IP address, the time of the visit, the IT solutions used), the purpose of which is to identify the User, the technical development of the IT system, to produce statistics and analytics, to enhance the user experience and to enforce the legitimate interests of the Data Controller.



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The Data Controller considers the rules, regulations, and obligations described in this Data Protection Policy to be legally binding upon itself, applies them in its operations and states that the data protection rules and procedures applied and described in this document comply with the applicable national and EU data protection legislations. The Data Controller further declares it considers important to have the right of informational self-determination, with particular regard to personal data and takes all available organizational, operational, regulatory and technological measures within its scope to enforce and have enforced these rights.

The currently effective version of the Data Protection Policy is available at a [www.socwise.eu](http://www.socwise.eu). The Data Controller may change the Data Protection Policy at any time, with informing the data subjects.

## 2 Definitions

**Consent:** A voluntary and determined expression of the will of the data subject, based on appropriate information and giving unambiguous consent to the processing of personal data concerning the data subject, whether full or on specific actions.

**Data Controller:** Any natural or legal person, or any entity without legal personality, who either alone or jointly with others determines the purpose of data management, makes and implements decisions relating to data management (including the equipment used), or have them implemented with a Data Processor; Regarding this Policy, the Data Controller is SOCWISE Ltd. (1145 Budapest, Róna utca 120-122., company registration number: (01 09 356167).

**Data Processing:** Any operation or set of operations performed on the data, regardless of the procedure used and the place of application, provided that the technical task is performed on the data;

**Data Processor:** Any natural or legal person, or any entity without legal personality, who processes data -including legal provision- under its contract with the Data Controller;

**Data Subject/User:** Any natural person identified or directly or indirectly identifiable based on personal data;

**Personal data:** Data related to the data subject - in particular the name of the data subject, identification number and knowledge of one or more physical, physiological, mental, economic, cultural or social identities - and the conclusion drawn from the data related to the data subject;

**Personal data breach:** Unlawful handling or processing of personal data, particularly including unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction or damage.



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**Objection:** A statement by the data subject objecting the processing of personal data and requesting the termination of data processing, or requesting deletion of the processed data.

**Website:** The sum of the digital data content available at [www.socwise.eu](http://www.socwise.eu) and its sub-pages. However, any website referred by the Website but not operated by the Data Controller, shall not be considered under this term in this document.

### 3 Data Controller information

3.1 Company data of Data Controller Name: SOCWISE Ltd.

Headquarters: 1145 Budapest, Róna utca 120-122

Company registration number: 01 09 356167

Tax number: 27902857242

3.2 Contact details of the Data Controller

The Network business line leader may be contacted with any data protection issues. Name and contact details can be found in the 'Data controllers contact details' table available at [www.socwise.eu](http://www.socwise.eu).

The Data Controller retains the received data protection requests (e-mails) for the period specified for this data management in chapter 3. After that time, they will be irretrievably deleted.

3.3 Privacy Officer of the Data Controller

The Data Controller does not employ a Privacy Officer.

The name and contact details of the privacy notifications responsible are listed in the 'Data controllers contact details' table available at [www.socwise.eu](http://www.socwise.eu).

## 4 Data management of the Data Controller and the managed personal data

### 4.1 Personal data related to Presales activities

Personal data are handled by the following processes in the context of this activity:

- Presales tasks related to the product
- Product selection
- Creating proposals
- Preparing technical content
- Preparing Proof of Concept (POC) Category of the data processed within the activity:
- Business contact details for contract and commercial contacts
- Company contact details for employees

In the context of data management related to the individual processes above, the following personal data are requested by the Data Controller:

Presales tasks related to the product, Product selection, Creating proposals, Preparing technical content, Preparing Proof of Concept (POC)	
Processed personal data:	Name, Company phone numbers, E-mail address, Position, Company name
The legal basis for data management:	Consent or approval of the data subject
The purpose of data management:	Gathering information, assessing needs, offering proposal, contract preparation
Possible consequences in case data is not provided:	Keeping contact is not possible
Retention time of managed data:	For 8 years after the termination of the contract in case of a proposal based contracts. Relevant legislation: Act C of 2000. (Hungarian accounting act) For 30 days after the proposal deadline in case no contract is made based on the proposal. Relevant legislation: Act CXII of 2011. (Hungarian information act)
Location of data management:	Central site of data controller: 120-122 Róna str., 1145 Budapest

#### 4.2 Personal data related to Sales activities

Personal data are handled by the following processes in the context of this activity:

- Exploring business opportunities
- Keeping contact with customers
- Building customer relationship
- Defining the basic contractual terms and conditions Category of the data processed within the activity:
  - Business contact data of contractual and commercial contacts
  - Business contact data of employees

In the context of data management related to the individual processes above, the following personal data are requested by the Data Controller:

Presales tasks related to the product, Product selection, Creating proposals, Preparing technical content, Preparing Proof of Concept (POC)	
Processed personal data:	Name, Company phone numbers, E-mail address, Position, Company name
The legal basis for data management:	Consent or approval of the data subject
The purpose of data management:	Gathering information, assessing needs, offering proposal, contract preparation
Possible consequences in case data is not provided:	Keeping contact is not possible
Retention time of managed data:	For 8 years after the termination of the contract in case of a proposal based contracts. Relevant legislation: Act C of 2000. (Hungarian accounting act) For 30 days after the proposal deadline in case no contract is made based on the proposal. Relevant legislation: Act CXII of 2011. (Hungarian information act)
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest



#### 4.3 Personal data related to Project management activities

Personal data are handled by the following process in the context of this activity:

- Forwarding information included in documents created during PM Process to different business units

Category of the data processed within the activity:

- Business contact data of contractual and commercial contacts
- Business contact data of employees

In the context of data management related to the above process, the following personal data are requested by the Data Controller:

Forwarding information included in documents created during PM Process to different business units (Project Foundation Document, Privacy Statements, Reminders)	
Processed personal data:	Name, Company phone numbers, E-mail address, Position
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	Keeping contact, Service fulfillment
Possible consequences in case data is not provided:	Providing service is not available
Retention time of managed data:	Contract dependant, but at least for 7 years after the contract expiry. Relevant legislation: Act V of 2013. (Civil Code of Hungary)
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest
Processed personal data:	Data managed via privacy statement (Home address, mother's name, date of birth, ID number, signing witness' data, signature)
The legal basis for data management:	Fulfillment of contractual obligation; Consent or approval of the data subject; Obligatory by law, Legitimate interest (Consideration of interest)
The purpose of data management:	Fulfillment of contractual obligation, Service fulfillment
Possible consequences in case data is not provided:	Providing service is not available
Retention time of managed data:	Contract dependant, but at least for 7 years after the contract expiry. Relevant legislation: Act V of 2013. (Civil Code of Hungary)
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest

#### 4.4 Personal data related to Integration service activities

Personal data are handled by the following processes in the context of this activity:

- Delivery of sold products or services
- Implementation of sold products or services according to technical information received on the contract

Category of the data processed within the activity:

- Business contact data of contractual and commercial contacts
- Business contact data of employees

In the context of data management related to the individual processes above, the following personal data are requested by the Data Controller:

Delivery of sold products or services, Implementation of sold products or services according to technical information received on the contract	
Processed personal data:	Name, Company phone numbers, E-mail address, Position
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	Delivery of product / service
Possible consequences in case data is not provided:	Delivery of product / service is not possible, or hindered by difficulties
Retention time of managed data:	For 8 years after the termination of the contract. Relevant legislation: Act Cof 2000. (Hungarian accounting act)
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest

#### 4.5 Personal data related to Operations service activities

Personal data are handled by the following processes in the context of this activity:

- Operating a system owned by the Client or SOCWISE in the Client environment
- Service provided remotely by default, but on-premise service if needed Category of the data processed within the activity:
  - Business contact data of contractual and commercial contacts
  - Business contact data of employees

In the context of data management related to the individual processes above, the following personal data are requested by the Data Controller:

Operating a system owned by the Client or SOCWISE in the Client environment, Remotely provided service by default, but on-premise service if needed	
Processed personal data:	Name, Company phone numbers, E-mail address, Position
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	To perform contractual tasks (eg. keeping contact)
Possible consequences in case data is not provided:	Performing contractual tasks is not possible
Retention time of managed data:	For 8 years after the termination of the contract. Relevant legislation: Act C of 2000. (Hungarian accounting act)
Location of data management:	Central site of data controller: 120-122 Róna str., 1145 Budapest

#### 4.6 Personal data related to Managed Services data management activities

Personal data are handled by the following process in the context of this activity:

- Remote management and operation of a device placed at the Client and owned by SOCWISE or the Client.

Category of the data processed within the activity:

- Business contact data of contractual and commercial contacts (In a contractual relationship.)
- Business contact data of employees (In a contractual relationship.)

In the context of data management related to the above process, the following personal data are requested by the Data Controller:

Remote management and operation of a device placed at the Client and owned by SOCWISE or the Client	
Processed personal data:	Name, Company phone numbers, E-mail address, Position
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	To perform contractual tasks (eg. keeping contact)
Possible consequences in case data is not provided:	Performing contractual tasks is not possible
Retention time of managed data:	For 8 years after the termination of the contract. Relevant legislation: Act C of 2000. (Hungarian accounting act)
Location of data management:	Central site of data controller: 120-122 Róna str., 1145 Budapest

#### 4.7 Personal data related to Managed Services data processing activities

Personal data are handled by the following process in the context of this activity:

- Remote management and operation of a device placed at the Client and owned by SOCWISE or the Client.

Category of the data processed within the activity:

- Technical data of the Client's logged users. These are the employees or customers of the Client. In the context of data management related to the above process, the following personal data are requested by the Data Controller:

Remote management and operation of a device placed at the Client and owned by SOCWISE or the Client	
Processed personal data:	Technical data of employees or customers of the Client in the the database handed over by the Client for processing purposes.
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	Implementation of the contracted service
Possible consequences in case data is not provided:	Providing service is not available
Retention time of managed data:	Until contract termination. Relevant legislation: GDPR
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest

#### 4.8 Personal data related to Back Office activities

Personal data are handled by the following processes in the context of this activity:

- Entire contract lifetime management (contract preparation, contract writing, review, signing, storage)
- Handing over the contractual terms to the different business areas Category of the data processed within the activity:
- Business contact data of contractual and commercial contacts
- Business contact data of employees

In the context of data management related to the individual processes above, the following personal data are requested by the Data Controller:

Entire contract lifetime management (contract preparation, contract writing, review, signing, storage), Handing over the contractual terms to the different business areas	
Processed personal data:	Name, Company phone numbers, E-mail address, Position
The legal basis for data management:	Legitimate interest (Consideration of interest), Fulfillment of contractual obligation
The purpose of data management:	Ensuring activities in relation to product / service, bidding, contract preparation, Service fulfillment
Possible consequences in case data is not provided:	Providing service is not available, breach of contract
Retention time of managed data:	For 8 years after the termination of the contract. Relevant legislation: Act C of 2000. (Hungarian accounting act)
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest

#### 4.9 Personal data related to Consultation activities

Personal data are handled by the following process in the context of this activity:

- Consulting service provided for the Clients at various fields Category of the data processed within the activity:
- Business contact data of contractual and commercial contacts
- Business contact data of employees

In the context of data management related to the above process, the following personal data are requested by the Data Controller:

Consulting service provided for the Clients at various fields	
Processed personal data:	Name, Company phone numbers, E-mail address, Position, Company name, Business Line
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	Keeping contact, Gathering information, assessing demands, Service fulfillment
Possible consequences in case data is not provided:	Providing service is not possible
Retention time of managed data:	Until contract termination. Relevant legislation: GDPR
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest

#### 4.10 Personal data related to Support activities

Personal data are handled by the following process in the context of this activity:

- Support for sold products, manufacturer support Category of the data processed within the activity:
- Business contact data of contractual and commercial contacts
- Business contact data of employees

In the context of data management related to the above process, the following personal data are requested by the Data Controller:

Support for sold products, manufacturer support	
Processed personal data:	Name, Company phone numbers, E-mail address, Position
The legal basis for data management:	Fulfillment of contractual obligation, legitimate interest (consideration of interests)
The purpose of data management:	To perform contractual tasks (eg. keeping contact)
Possible consequences in case data is not provided:	Performing contractual tasks is not possible
Retention time of managed data:	For 8 years after the termination of the contract. Relevant legislation: Act C of 2000. (Hungarian accounting act)
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest



#### 4.11 Personal Data related to Marketing activities

##### 4.11.1 Newsletters

Personal data are handled by the following process in the context of this activity:

- Sending newsletters and event invitations Category of the data processed within the activity:
- Data of people signed up on newsletters

In the context of data management related to the above process, the following personal data are requested by the Data Controller:

Sending newsletters and event invitations	
Processed personal data:	Name, Company phone numbers, E-mail address, Position, Time of signing up (Optin_ Timestamp / Last_Updated_ Timestamp), The IP-address used upon signing up (Optin_IP_Address), GPS data (Latitude / Longitude), Zip_Code, Marketing Permissions, Source
The legal basis for data management:	Given consent of data subject
The purpose of data management:	Identification, enabling signing-up on newsletters.
Possible consequences in case data is not provided:	Identification, signing-up on newsletters is not available.
Retention time of managed data:	Until withdrawing consent, that is until opting out.
Location of data management:	Centrál site of dátá controller: 120-122 Róna str., 1145 Budapest

#### 4.11.2 Social networking sites

In order to promote its products and services and communicate more effectively with its users, the Data Controller will feature itself on the following social networking sites:

[www.socwise.eu](http://www.socwise.eu)

The Data Controller regularly publishes news about its products and events via the above social networking sites. The general use and the related data management are governed by the data management policy of the given social networking site.

#### 4.11.3 Google Analytics

The Data Controller uses the Google Analytics application on its website, which is Google's web analytics service.

Google Analytics uses cookies to help analyzing the usage of the web page. By activating IP anonymization on the web pages, Google shortens the user's IP address and the full IP address is transmitted only in exceptional cases. The Data Controller uses the information to evaluate how the user used the Site and reports on the site activities. On the basis of this information Google may provide the Controller with additional services related to site and internet usage. Within Google Analytics, the IP address transmitted by the user's browser is not reconciled with other Google data. Cookies may be prevented from to be stored by properly configuring the user's browser, but please note that in this case, not all features of the website may be fully utilized. The user may also prevent Google from collecting and processing cookie-related information about usage of the website (including IP address) by downloading and installing the browser plug-in available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=hu>

#### 4.12 Technical data

Technical data are the data automatically generated and recorded during the operation of the Data Controller's systems. Some technical data are stored and in some cases logged automatically by the system regardless of a specific statement or act of the Data subject. The technical data are not applicable to directly identify the data subject person, but they can be linked to user data and this way identification may become possible. Only the Data Controller and Data Processors can have access to the technical data.



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SOCWISE handles technical data only in the below activities:

Activity: Human Resource Management - Recruitment, Selection

Data handled during data management: IP addresses of users applying for any open position and the time of their actions upon entering the Website.

The legal basis for data management: Legitimate interest of the Data Controller.

The purpose of data management: Legal provision of the service (eg. preventing unauthorized use and protecting against cyber attacks).

Retention time of managed data: Until contract termination. Relevant legislation: GDPR

Activity: Managed Services \ Data processing

Data handled during data management: Technical data of employees or customers of the Client in the database handed over by the Client for processing purposes; IP-addresses

The legal basis for data management: Fulfillment of contractual obligation

The purpose of data management: Implementation of the contracted service Possible consequences in case data is not provided: Providing service is not available.

Retention time of managed data: Until contract termination. Relevant legislation: GDPR

#### 4.13 Browser cookies

##### 4.13.1 Purpose of the cookies

HTTP cookies are small data packets created by the server running the visited web page and the Client's web browser during the first visit, if it is enabled in the browser. Cookies are stored on the User's computer at a predetermined location depending on the browser. The browser sends back the stored cookies and various information about the client to the web server upon further visits. The cookies make the server able to identify the user, collect various information and create statistics about the user. Main functions of the cookies:

- Cookies collect information about the users and their devices;
- Cookies save the custom settings of the users which may be used at online transactions thus preventing to have them re-typed;
- Cookies make website usage easier, simpler, more convenient, more streamlined;
- Cookies make needless to re-enter the data the user have already provided;
- Cookies usually improve the user experience. SOCWISE does not manage any Browser Cookie data.

#### 4.13.2 Session cookies

The session cookies make possible for the users to smoothly browse the website of the Data Controller, use its functions and the available services. This type of cookie is available until the end of the browsing session, the session cookies are automatically deleted from the computer or from any other device used for browsing when the browser is closed.

SOCWISE does not manage any Session Cookie data.

#### 4.13.3 Analytics cookies

SOCWISE does not manage any Analytics Cookie data placed by third parties.

##### 4.13.4 Options to set rules or disable cookies

The Data Subject has the option to set rules for certain types of cookies (eg. not to use cookies, disable cookies, etc.) via the appropriate browser settings. Information on the cookies' selective or general disable settings can be found in the "Help" menu of the browser.

The user can gain information via most browser's "Help" menu on how the cookies can be:

- generally disabled;
- disabled individually;
- deleted individually or comprehensively;
- set how cookies are accepted (auto-accept, ask each time, etc.);
- perform other cookie operations.

## 5 The purpose, way and legal basis of data management

### 5.1 General data management guidelines

Data Controller performs management of personal data listed in activities of Section 3, in all cases for the purpose specified for the data management and on the legal basis specified therein; in accordance with the legislations listed in point 4.2.

Personal data will be managed in all cases with the voluntary consent of the Data subject, which may be withdrawn at any time by the Data subject.

The Data Controller is obliged to handle, hand-over, transmit, and store certain personal data in different ways than described in this Policy, under certain statutory obligations and under certain unconventional conditions. In such cases and if the provisions of the relevant legislation permit or do not expressly prohibit notification, the Data Controller notifies the Data subjects.

## 5.2 Legislations providing legal basis for data processing

The Data Controller performs personal data management according to the following legislations:

- GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council
- Act V of 2013. (Civil Code of Hungary)
- Act CXII of 2011. (Hungarian information act)
- Act C of 2000. (Hungarian accounting act)
- Act LIII of 2017. on the Prevention of money laundering and financing terrorism (Money Laundering Act)
- Act I of 2012. on the Labor Code
- Act LXXX of 1997. on social security benefits and private pension entitlements
- Act CVIII of 2001. on E-commerce services
- Act XLVIII of 2008. on the basic conditions and limitations of economic advertising
- Act C of 2012. on the Criminal Code
- Act L of 2013. on Information Security
- Act CL of 2017. on the Rules of Taxation
- Act CCXXXVII of 2013. on Credit Institutions and Financial Enterprises

## 6 Storage and security of data

### 6.1 Physical data storage locations

The Data Controller stores the personal data on its integrated IT system. The elements of the system are located at the central site of the Data Controller in each case:

Activity	Physical data storage locations	Address	Comment
Presales	Central site of the Data controller	120-122 Róna str., 1145 Budapest	Stored on paper basis
Sales	Central site of the Data controller	120-122 Róna str., 1145 Budapest	Stored on paper basis
Project management	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Integration service	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Operations service	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Managed Services data management	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Managed Services data processing	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Back Office	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Consultation	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Support	Central site of the Data controller	120-122 Róna str., 1145 Budapest	
Sending Newsletters	Central site of the Data controller	120-122 Róna str., 1145 Budapest	

## 6.2 IT implementation for data storage and logical security

The Data controller performs the personal data management primarily on its properly established and protected IT system. Ensures the appropriate level of basic information security attributes for the data stored, processed, and transmitted on its IT system, such as:

- their Integrity, that is, the authenticity of the data is ensured;
- their Confidentiality, that is, only those entitled have access to them and only to the extent of their entitlement;
- their Availability, that is, the data is accessible to the those entitled during the expected availability period. The needed IT infrastructure is ready for operation.

Data Controller protects the managed data with a structured system of:

- organizational, operational protection measures;
- physical security protection measures;
- Information Security protection measures.

Data Controller develops and operates a system of protection measures and levels of protection for each security measure in a manner commensurate with the risks posed by the threats to the protected data. Data protection measures are aimed primarily at protecting against accidental or intentional deletion, unauthorized access, deliberate and bad faith disclosure, accidental disclosure, data loss, and data destruction.

## 7 Data transfer, data processing, circle of data acquaintances

The data is primarily available to the Data Controller and its internal staff to the extent permitted by the permissions, the permission system and other internal regulations. The Data Controller have certain data-related operations and tasks performed by third-party data processors. The Data Controller does not disclose the data beyond those listed below and does not pass it on to other third parties.

Activity	Company name	Address	Role	The scope of data handed over
Presales, Sales, Operations, Support	RSA	Austria, Wien 1120 Am Euro Platz 1/4	Data processor	- Name - Company name - Email address - Phone number - Position
Presales, Sales, Operations, Support	Arrow ECS	1117 Budapest, Neumann János u. 1	Data processor	- Name - Company name - Email address - Phone number - Position
Presales, Sales, Operations, Support	Juniper	1054 Budapest Szabadsag ter 7, Bank Center, Citibank Torony	Data processor	- Name - Company name - Email address - Phone number - Position
Presales, Sales, Operations, Support	Relnet	1047 Budapest, Váci út 71	Data processor	- Name - Company name - Email address - Phone number - Position
Presales, Sales, Operations, Support	Clico	1134 Budapest, Dévái u. 26-28	Data processor	- Name - Company name - Email address - Phone number - Position
Presales, Sales, Operations, Support	Hewlett Packard Enterprise (HPE)	1117 Budapest Aliz u.1., 3rd Floor (North Wing)	Data processor	- Name - Company name - Email address - Phone number - Position
Presales, Sales, Operations, Support	Ingram Micro	1138 Budapest, Mádárász Viktor u. 47- 49	Data processor	- Name - Company name - Email address - Phone number - Position



Presales, Sales, Operations, Support	Alef	1132 Budapest Váci út 30. 3. emelet	Data processor	- Name - Company name - Email address - Phone number - Position
Marketing, Newsletters	Mailchimp (The Rocket Science Group LLC)	675 Ponce de Leon Ave, Atlanta, GA 30308 USA	Data processor	- Name - Company name - E-mail address - Position - Time of signing up - GPS data - Marketing Permissions - Source
Marketing, Newsletters	Eventbrite	155 5th St, 7th Floor, San Francisco, USA	Data processor	- Name - Company name - E-mail address - Phone number - Position

## 8 Rights of the data subject

Regarding the personal data managed by the Data Controller the data subject have - among others - the below described rights.

### 8.1 Right of access by the data subject (GDPR Article 15)

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- the envisaged period for which the personal data will be stored;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;

- the existence of automated decision-making, including profiling and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form within 30 days of submission.

#### 8.2 Right to rectification (GDPR Article 16)

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### 8.3 Right to erasure ('right to be forgotten') (GDPR Article 17)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

Data erasure can not be initiated to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;

- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defence of legal claims.

#### 8.4 Right to restriction of processing (GDPR Article 18)

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

#### 8.5 Right to data portability (GDPR Article 20)

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

#### 8.6 Right to object (GDPR Article 21)

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

#### 8.7 Automated individual decision-making, including profiling (GDPR Article 22)

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

#### 8.8 Right to withdraw consent (GDPR Article 7)

The data subject shall have the right to withdraw his or her consent at any time.

#### 8.9 Legal remedies

In the event of a violation of its rights, the Data Subject may request information, legal remedy or complain to the person responsible for privacy notifications specified in Section 2.3. The name and contact details of the person responsible for privacy notifications are listed in the 'Data Controller Contact Details' table, available at [www.socwise.eu](http://www.socwise.eu).

In case of ineffectiveness, the data subject has the right to apply to the court or contact the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

#### 8.10 Contact details of Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Name: Hungarian National Authority for Data Protection and Freedom of Information / Nemzeti Adátvédelmi és Információszabádság Hátóság (NAIH) Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C. Postal address: 1530 Budapest, Pf.: 5.

Tel: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) Website: <http://www.naih.hu>

#### 9 Other provisions

In the event of a request from an authority or other legal obligation based organization, the Data Controller may be obliged to hand over data. In such cases, the Data Controller will endeavor to disclose only such personal information as is strictly necessary for the obligation to disclose the data.