

PRIVACY POLICY

Contractual relations Management of contractual partners' data

Applicable from 2th Sept 2024

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

1. Data controller

Name of data controller:		Telvice Zrt.
Address of data controller:		2040 Budaörs, Szabadság út 135.
Contact details of data controller:	e-mail	telvice@telvice.hu
	telephone	+36 20/235-7957
	website	https://www.telvice.hu/
Name of data protection officer		-
Contact details of data protection officer		-

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name, title E-mail address Phone number	Contracts with subcontractors and other contractual partners Performance of the contract, fulfillment of invoices	Processing is necessary for the performance of a contract - GDPR Article 6 (1) (b)	8+1 years after termination of contract.

Related legislation

--

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity

Data processors (performing technical tasks related to data processing)	A.M.C. Controlling Kft. 8000 Székesfehérvár, Havranek utca 43. Fsz. Accountant, BinX Zrt. 1031 Budapest, Záhony utca 7. Bank(s), financial institutions(s), OTP Bank Nyrt. 1051 Budapest, Nádor utca 16. Bank(s), financial institutions(s), MBH Bank Nyrt. 1057 Budapest, Váci u. 38. Bank, Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd 1031 Budapest, M épület, Graphisoft park 3. Operation of softwares belong to O365 licences, mail system, KBOSS.hu Kft. 1031 Budapest Záhony utca 7. számlázz.hu Operator of billing software, Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd 1031 Budapest, M épület, Graphisoft park 3. Sharepoint cloud storage
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd, USA, Terms and conditions Privacy Policy Data Privacy Framework, https://privacy.microsoft.com/hu-hu/privacystatement , https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA https://www.dataprivacyframework.gov/list , acces to parent company Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd, USA, Terms and conditions, Privacy Policy Data Privacy Framework, https://privacy.microsoft.com/hu-hu/privacystatement , https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA https://www.dataprivacyframework.gov/list , acces to parent company

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Personal data are only accessible for those employees who need them for the performance of their duties, and the managing director has access the data - this is ensured by the company through authorization management.
Data security measures	<ul style="list-style-type: none"> Locked doors - unauthorized persons will not be able to enter the office Alarm system Lockers for paper documents Antivirus on computers egular backups Code or biometric protection on mobile devices Computers are password protected Encrypted hard drives Events of computer work are logged Rights management Confidentiality document signed by employees Applications are password protected

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to data portability</i> - The data subject shall have right to request their personal data stored in digital tabular form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa utca, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Contractual relations Management of contacts' data

Applicable from 2th Sept 2024

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

1. Data controller

Name of data controller:		Telvice Zrt.	
Address of data controller:		2040 Budaörs, Szabadság út 135.	
Contact details of data controller:	e-mail	info@dunamedical.com	
	telephone	+36 1 790 7070	
	website	www.dunamedicalcenter.org	
Name of data protection officer		-	
Contact details of data protection officer		-	

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name, post E-mail address Phone number	Contractual relations - communication	Legitimate interest – GDPR Article 6(1)(f)	8+1 years after termination of contract.

Related legislation

--

Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject or his/her employer

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	A.M.C. Controlling Kft. 8000 Székesfehérvár, Havranek utca 43. Fsz. Accountant, DIGI Távközlési és Szolgáltató Kft. 1013 Budapest, Krisztina körút 39. Telecommunications operator(s), Vodafone Magyarország Zrt. 1112 Budapest, Boldizsár u. 2. Telecommunications operator(s), Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd 1031 Budapest, M épület, Graphisoft park 3. Operation of softwares belong to O365 licences, mail system,

	Zoho Corporation 4141 Hacienda Drive, Pleasanton, CA 94588 USA Marketing service, Zoho CRM software, Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd 1031 Budapest, M épület, Graphisoft park 3. Sharepoint cloud storage Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd 1031 Budapest, M épület, Graphisoft park 3. Teams online communication site
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd, USA, Terms and conditions Privacy Policy Data Privacy Framework, https://privacy.microsoft.com/hu-hu/privacystatement , https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA https://www.dataprivacyframework.gov/list , acces to parent company Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd, USA, Terms and conditions, Privacy Policy Data Privacy Framework, https://privacy.microsoft.com/hu-hu/privacystatement , https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA https://www.dataprivacyframework.gov/list , acces to parent company

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Personal data are only accessible for those employees who need them for the performance of their duties, and the managing director has access the data - this is ensured by the company through authorization management.
Data security measures	<ul style="list-style-type: none"> Locked doors - unauthorized persons will not be able to enter the office Alarm system Lockers for paper documents Antivirus on computers Regular backups Code or biometric protection on mobile devices Computers are password protected Encrypted hard drives Events of computer work are logged Rights management Confidentiality document signed by employees Password protect application

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p> <p><i>Right to object</i> - If the legal basis is based on a legitimate interest or public authority, the data subject may object to the processing of his/her personal data, however objection does not mean the immediate deletion of data.</p> <p><i>Right to restriction of processing</i> – Data Subject shall have the right to request for suspension of personal data processing for the period of investigation if he/she does not consider the data controller entitled.</p> <p><i>Right to data portability</i> - Data Subject shall have the right to receive the personal data concerning him or her in a structured, digital form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform

data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa utca, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.