

## PRIVACY POLICY

### Management of customers' data Complaint handling

**Applicable from 2<sup>th</sup> 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	<a href="mailto:telvice@telvice.hu">telvice@telvice.hu</a>
	telephone	+36 20/235-7957
	website	<a href="https://www.telvice.hu/">https://www.telvice.hu/</a>
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 Contact details Content of Complaint	Investigation of complaints, reports, response, case management, administration	Necessary to comply with a legal obligation – GDPR Article 6(1)(c)	3 years from the date of filing the complaint in accordance with Section 17/A (7) of the Consumer Protection Act.

##### Related legislation

Act CLV of 1997 on Consumer Protection (Consumer Protection Act) Chapter VI

##### 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
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##### Data will be transmitted to:

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

Data processors (performing technical tasks related to data processing)	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 systems, 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
Recipients	Competent authority - where appropriate

### 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, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> , <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> , acces to parent company Zoho Corporation, USA, Privacy Policy, <a href="https://www.zoho.com/privacy.html">https://www.zoho.com/privacy.html</a> , data storage, Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd, USA, Terms and conditions, Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> , <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> , acces to parent company

### Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

### Access to data and data security measures:

<b>Restriction of access</b>	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.
<b>Data security measures</b>	<ul style="list-style-type: none"> <li>Locked doors - unauthorized persons will not be able to enter the office</li> <li>Alarm system</li> <li>Lockers for paper documents</li> <li>Antivirus on computers</li> <li>Regular backups</li> <li>Code or biometric protection on mobile devices</li> <li>Computers are password protected</li> <li>Encrypted hard drives</li> <li>Events of computer work are logged</li> <li>Rights management</li> <li>Confidentiality document signed by employees</li> <li>Applications are password protected</li> </ul>

### 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:

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

## 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.