

PRIVACY POLICY

Website data management Downloads and demo registration

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 Business email address, position Phone number Company name and country Data given in comment section	Providing downloads of demo and professional materials, sending materials, contacting the downloader for marketing purposes, and for satisfaction surveys	Legitimate interest – GDPR Article 6(1)(f)	For 2 years after the last interaction or until the objection of the data subject, unless another legal basis supports data processing.

Related legislation

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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)	DIGI Távközlési és Szolgáltató Kft. 1013 Budapest, Krisztina körút 39. Telecommunications operator(s) Vodafone Magyarország Zrt. 1112 Budapest, Boldizsár u. 2. Telecommunications operator(s), Website developer, Tárhely.Eu Szolgáltató Kft. 1097 Budapest, Könyves Kálmán körút 12-14. Website operator, Tárhely.Eu Szolgáltató Kft. 1097 Budapest, Könyves Kálmán körút 12-14. Website provider, 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	

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 Zoho Corporation,USA,Privacy Policy, https://www.zoho.com/privacy.html , data storage 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	Antivirus on computers Code or biometric protection on mobile devices Computers are password protected Events of computer work are logged Rights management Password protect apps Website HTTPS security protocol

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 legal interest or on public authority, the data subject shall have right to object processing their personal data, but it does not mean immediate erasure of their data.</p> <p><i>Right to restriction of processing</i> - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.</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>

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.