

# **PRIVACY POLICY**

# Data management of interested parties Sales activities, offers

#### Applicable from 2 th 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.
	e-mail	telvice@telvice.hu
Contact details of data controller:	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

data processing (storage) period			
Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name E-mail address Phone number Other personal data required for making an offer Personal data in comments - where applicable	Selling software or services, preparing and sending offers, pre-contractual steps to those interested in the service or to existing customers In case of rejected tenders, possible subsequent contact	Legitimate interest – GDPR Article 6(1)(f)	In case of rejection of the offer, the data controller stores the personal data for 2 years from the last interaction, however, in case of objection of the data subject, the personal data will be destroyed immediately. In case of acceptance of the offer and conclusion of a contract, the related data management information shall applicable.

# **Related legislation**

# Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	
	Does automated decision-making occur during data processing?
_	Short understandable description of automatization

Short, understandable description of automatizat	ion
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No	
If ves data subjec	t has the right to request for manual human intervention

It 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)	<ul> <li>DIGI Távközlési és Szolgáltató Kft. 1013 Budapest, Krisztina körút 39. Telecommunications operator(s),</li> <li>Vodafone Magyarország Zrt. 1112 Budapest, Boldizsár u. 2. Telecommunications operator(s)),</li> <li>Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd 1031 Budapest, M épület,</li> <li>Graphisoft park 3. Operation of softwares belong to O365 licences, mail systems,</li> <li>Zoho Corporation 4141 Hacienda Drive, Pleasanton, CA 94588 USA Marketing service, Zoho</li> </ul>
	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 channel
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 <u>https://www.dataprivacyframework.gov/list</u>, 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 Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd,USA, Terms and conditions, Privacy Policy Data Privacy Framework.gov/list, acces to parent company Microsoft Magyarország Kft., Microsoft Ireland Operations Ltd,USA, Terms and conditions, Privacy Policy Data Privacy Framework.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.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 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	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
	Applications are password protected

# 3. Rights of data subject:

Rights of data subject based on legal basis and their explanations

*Right to information* - Data Subject shall have the right to find out the way personal data is handled before data processing begins

*Right to rectification* - 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.

*Right of access* – Data Subject shall have the right to request for personal data stored about him/her from the data controller.

Right to object - 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. *Right to restriction of processing* - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.

Right to data portability - The data subject shall have right to request their personal data stored in digital tabular form.

# 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	Mailbox 9., H-1363 Budapest	
address		
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 chioce. 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.

# By requesting a quote, I express my acceptance for handling and storing of my data in accordance with the related information.