

CANDID ITS KFT.'S

DATA PROCESSING POLICY

This Data Processing Policy (“**Policy**”) in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 (“**GDPR**”) of the European Parliament and of the Council aims to provide data subjects with information about personal data used for data processing activities as listed below.

1. The data controller and contact details

Name of the data controller company: **CANDID ITS Kft.** (hereinafter referred as (“**Data Controller**”))

Registered seat: 1131 Budapest, Babér street 1-5.

Postal address: 1131 Budapest, Babér street 1-5.

Company registration no.: 01-09-688189

E-mail: info@candidits.hu

2. The rights of the data subject

2.1. Service Description:

In circumstances where the user wishes to contact the Data Controller for any reason by using <http://candidits.com/#support>, <http://candidits.hu/#support>, the Data Controller may only process the user’s data based on the user’s consent only for the period of the contact i.e. answering the question or solving any problems.

2.2. Data subjects:

Interested users, users initiating contact

2.3. The purpose of data processing:

Contact, answering the question submitted, resolving any emerging problems.

2.4. Subscriptions available at:

<http://candidits.com/#support>, <http://candidits.hu/#support>

2.5. Processed data:

Last name, first name, e-mail address.

2.6. The duration of the data processing

Until answering the emerging question or resolving the problem, i.e. when the aim of contacting is attained.

2.7. The legal basis of data processing:

The Data Subject’s consent (voluntary, based on concrete and specific information and there must also be a clear move toward the consent). The consent shall be given by the Data Subject by ticking the checkbox before the contact by filling in a separate declaration which is different from other declarations. The consent must be given voluntarily and the Data Subject shall have the right to withdraw his or her consent at any time by giving notice addressed to the Data Controller. The Data Subject may send the notice to any of the contact addresses specified in point 1. The withdrawal of the consent shall not affect the Data Subject but it thwarts the attainment of the aims of contacting. The withdrawal shall not affect the lawfulness of the data processing prior to the withdrawal of the consent.

2.8. The data is accessible on behalf of the Data Controller:

Managing Director of Data Controller and responsible product owner.

2.9. Data transfer:

Data Controller shall transfer the data to the following Data Processors:

Data Processor	Registered seat:	Task of the Data Processor:
rentIT Kft.	2030 Érd, Festó street 93.	System administration for the website, server support.

2.10. Automated decision-making and profiling

The Data Controller shall not carry out automated decision-making including profiling.

3. Processing of the data subject's data for marketing purposes

3.1. Service Description:

The Data Controller sends advertisements for marketing purposes to the users, interested people. You may subscribe for direct marketing purposes on the following website: <http://candidits.com/>.

3.2. Data subjects:

Interested people and subscribers.

3.3. The purpose of data processing:

Sending email newsletters including economic advertisements, providing up-to-date news and information on sales, monitoring the Data Controller's own and its partners' business proposals for direct marketing purposes, activity shown in sent messages (e.g. open, click) and sending personalized newsletters, contact.

3.4. Processed data:

Last name, first name, e-mail address.

3.5. The duration of the data processing

Before the withdrawal of data given voluntarily by the subscriber.

3.6. The legal basis of data processing:

The Data Subject's consent (voluntary, based on concrete and specific information and there must also be a clear move toward the consent). The consent shall be given prior to the subscription to the newsletter by the Data Subject by ticking the checkbox on the website by filling in a separate declaration which is separate from other declarations. Then you need to click on a confirmation link sent to your e-mail address. The consent must be given voluntarily and the Data Subject shall have the right to withdraw his or her consent at any time by giving notice to the Data Controller. The Data Subject may send the notice to any of the contact addresses specified in point 1. The withdrawal of the consent shall not affect the Data Subject. The withdrawal shall not affect the lawfulness of the data processing prior to the withdrawal of the consent.

3.7. The data is accessible on behalf of the Data Controller:

Managing director of Data Controller and responsible product owner.

3.8. Data transfer:

Data Controller shall transfer the data to the following Data Processors:

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3.9. Automated decision-making and profiling

Data Controller shall not carry out automated decision-making including profiling.

4. Rights of data subjects

4.1. Right to access

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

- a. the purposes of the processing relating to the specific personal data,
- b. the categories of personal data concerned,
- c. the categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries and international organizations (the Data Subject has the right to request information whether the appropriate safeguards are in place when the data is transferred to recipients in third countries and to international organizations),
- d. where possible, the envisaged period for which the personal data will be stored, or, if that is not possible, the criteria used to determine that period,
- e. the rights of the Data Subject (rectification, deletion of personal data or the restriction of processing thereof, right to data portability, and to the objection to processing such personal data),
- f. the right to lodge a complaint with a supervisory authority,
- g. where personal data are not collected from the Data Subject, any available information as to their source,

If the data were provided in electronic format, the requested information shall be provided in commonly used electronic format except when the data subject requests otherwise.

Prior to complying with the request, the Data Controller may request the Data Subject to further specify the request or the data processing activities.

If the Data Subject's right to access as described above adversely affects the rights and freedoms of others, especially trade secrets and intellectual property rights, the Data Controller is entitled to refuse to comply with the request in the necessary and proportionate amount.

In the event the Data Subject requests the above information in multiple copies, the Data Controller is entitled to bill a proportionate and reasonable amount of money in connection with the administrative costs of fulfilling the request.

If the personal data indicated by the Data Subject is not processed by the Data Controller, the Data Controller shall inform the Data Subject of this fact.

4.2. Right to rectification

The Data Subject shall have the right to the rectification of personal data concerning him or her. In case the personal data of the Data Subject is incomplete, the Data Subject shall have the right to have the incomplete personal data completed.

Rectification, supplementation shall be requested in writing – by postal or electronic mail to the address specified in point 1 – from the Data Controller by the Data Subject, if requested by telephone, the caller shall provide confirmation in writing.

The Data Subject is obliged to specify any inaccurate, incomplete data and to inform the Data Controller about the precise, comprehensive data when exercising his/her right to rectification/supplementation. The Data Controller has the right to request from the Data Subject that he/she appropriately proves the specified data – mainly with official documents – to the Data Controller when duly justified.

The Data Subject shall rectify or supplement the personal data without undue delay.

Data Controller, after the fulfillment of the Data Subject's request to exercise his/her right to rectification, shall inform each recipient of the Data Subject's personal data of the rectification without undue delay, unless this proves impossible or involves disproportionate effort. On request of the Data Subject, the Data Controller may inform him/her about the addressees.

4.3. Right to erasure ("right to be forgotten")

The Data Subject shall have the right to request from the Data Controller the deletion of any personal data relating to the Data Subject without undue delay where one of the following grounds applies:

- a. The personal data specified by the Data Subject are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Data Controller,

- b. The Data Controller processed personal data (including sensitive data) based on Data Subject's consent, the Data Subject has withdrawn the consent in writing and there is no other legal ground for the processing,
- c. The Data Subject objects to the data processing in the view of the Data Controller's processing based on legitimate interest, and there is no compelling legitimate grounds for the processing which override the interests rights and freedoms of the Data Subject , or for the establishment, exercise or defense of legal claims,
- d. The personal data have been unlawfully processed by the Data Controller,
- e. The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject to,
- f. The Data Subject object to the processing and there is no other legal ground for the processing.

The Data Subject shall present the request for erasure in writing including which personal data must be deleted for what reasons.

If the Data Controller approves the erasure request of the Data Subject, the personal data will be deleted from all registers and the Data Subject will be appropriately informed about this.

If the Data Controller is obliged to delete the personal data of the Data Subject, the Data Controller takes all reasonable measures – including the application of technical measures – that are necessary to inform about the mandatory deletion of personal data all those Data Controllers as well that got to know the personal data of the Data Subject due to the disclosure of the same. The Data Controller shall inform the other Data Controllers about the request of the Data Subject to delete links to the personal data of the Data Subject, or to delete copies or replications of such personal data.

Data Controller, after the fulfillment of the Data Subject's request to exercise his/her right to erasure, shall inform each recipient of the Data Subject's personal data of the rectification without undue delay, unless this proves impossible or involves disproportionate effort. On request of the Data Subject, the Data Controller may inform him or her about the addressees.

The Data Controller is not obliged to delete personal data if processing of such data is necessary:

- a. for exercising the right of freedom of expression and information,
- b. for compliance with a legal obligation laid down in Hungarian or European Union law which requires processing and to which the Data Controller is subject to,
- c. for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller,
- d. for reasons of public interest in the area of public health,
- e. for archiving purposes in the public interest, for scientific or historical research purposes or statistical purposes provided that the Data Subject's right to be forgotten is likely to render impossible or seriously impair the achievement of the research objectives,
- f. for the establishment, exercise or defense of legal claims.

4.4. Right to restriction of processing

The Data Subject shall have the right to request from the Data Controller the restriction of any personal data relating to the Data Subject where one of the following applies:

- a. the accuracy of the personal data is contested by the Data Subject (for a period enabling the Data Controller to verify the accuracy of the personal data),
- b. Data Controller processed the personal data unlawfully, but the Data Subject requests restriction instead of erasure,
- c. the Data 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 defense of legal claims,
- d. The Data Subject objects to the data processing in the view of the Data Controller's processing based on legitimate interest, and there is no compelling legitimate grounds for the processing which override the interests rights and freedoms of the Data Subject , or for the establishment, exercise or defense of legal claims. in this case the restriction lasts until it is established whether the rightful reasons of the Data Controller have precedence over the rightful reasons of the Data Subject.

When 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 defense 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.

The Data Subject shall be informed by the Data Controller when the restriction of processing is lifted.

Data Controller, after the fulfillment of the Data Subject's request to exercise his/her right to restriction, shall inform each recipient of the Data Subject's personal data of the rectification without undue delay, unless this proves impossible or involves disproportionate effort. On request of the Data Subject, the Data Controller may inform him or her about the addressees.

4.5. Right to object

Considering that the Data Controller does not perform data processing out of public interest and has no public powers, personal data are not processed for scientific or historical research purposes or statistical purposes, exercising the right to object shall only occur when processing is based on legitimate interest.

When the data of the Data Subject are processed on the basis of legitimate interest, it is an important guarantee provision that in connection with the data processing, it shall be ensured that Data Subject is properly informed and can exercise its right to object. This right shall be explicitly brought to the attention of the Data Subject at the time of the first communication.

Based on this, the Data Subject may exercise his or her right to object and in this case, the Data Controller must not process the personal data unless the following has been proven:

- a. the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or
- b. the data processing is related to the establishment, exercise or defense of legal claims.

4.6. Right to data portability

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

The right to data portability shall apply to the data which the Data Subject has provided to the Data Controller and

- a. the processing is based on Data Subject's consent or on a contract and
- b. the processing is carried out by automated means.

Should Data Subject request, Data Controller shall transfer personal data directly to another controller named in Data Subject's request, if technically feasible. The right to data portability does not create any obligation for data controllers to introduce or maintain data processing systems which are technically compatible with each other.

Regarding the right to data portability, the Data Controller must provide a data carrier for the Data Subject free of charge.

If the Data Subject's right to data portability adversely affects the rights and freedoms of others, especially trade secrets and intellectual property rights, the Data Controller is entitled to refuse to comply with the request in the necessary and proportionate amount.

Measures taken regarding data portability do not mean the deletion of the data; the Data Controller shall have the data registered as long as the Data Controller has the appropriate purpose or legal ground for the processing.

4.7. Right to an effective remedy

4.7.1. Contact details of the Data Controller

If Data Subject considers that the processing of his/her personal data by the Data Controller is prejudiced, he or she is entitled to contact in particular the Data Controller at any of the addresses specified in Point 1. The Data Controller is committed to comply and enforce the rights regarding the processing of personal data, therefore every complaint received is examined with due diligence. The Data Subject is informed about the results.

4.7.2. Right to an effective judicial remedy (right to initiate legal action)

The Data Subject – regardless of his/her right to lodge a complaint – shall have the right to an effective judicial remedy if he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data.

Lawsuits can be initiated before a Hungarian court against the Data Controller with a place of activity in Hungary.

In accordance with Subsection (1) and (3) of Section 23 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, the Data Subject has the right to initiate legal action before the court of his or her place of residence. The list of Hungarian courts is available at the following link: <http://birosag.hu/torvenyszekek>.

Regarding that the Data Controller is not considered to be an official authority acting on behalf of a Member State, the Data Subject has the right to initiate legal action before the court of his or her place of residence if the Data Subject's place of residence is in another Member State.

4.7.3. Right to lodge a complaint

According to Section 22 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, the Data Subject shall have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information if the Data Subject considers the processing of personal data relating to him or her by the Data Controller infringes the data protection laws currently in force, especially the provisions of the GDPR.

Contact details of the National Authority for Data Protection and Freedom of Information:

Website: <http://naih.hu/>

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Postal address: 1530 Budapest, Pf.: 5.

The Data Subject has the right to lodge a complaint with a supervisory authority in particular in the Member State of his or her place of residence, place of work or place of the alleged infringement.

4.7.4. Other enforcement of claims

The Data Subject shall have the right to mandate a not-for-profit organization or association which has been properly constituted in accordance with the law of a Member State, whose objectives laid down in their articles of association serve the interest of the public and the protection of data subjects' rights and freedoms with regard to the protection of their personal data to lodge a complaint, exercise the right to a judicial remedy with regard to a decision of a supervisory authority, initiate legal action, or exercise the right to receive compensation on his or her behalf.

5. Other provisions

If the Data Controller has reasonable doubts concerning the identity of the natural person making the request referred to in 4.1 - 4.6 of this Policy, the Data Controller may request the provision of additional information necessary to confirm the identity of the Data Subject.

The Data Controller reserves the right to amend the present Policy at any time. The Data Controller shall notify the Data Subject at least 3 days before the entry into force of the amendment by way of publishing it on its website.

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Budapest, 2019. _____

CANDID ITS Kft.