

**A 4iG PLC.**

# DATA PROTECTION AND DATA MANAGEMENT NOTICE

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## I. PRESENTATION OF THE DATA CONTROLLER

**4iG Public Limited Company** (hereinafter referred to as the 'Data Controller', 'Company' or 'We') constitutes the following data protection notice in order to ensure the legality of its internal data management processes and the rights of its data subjects.

Name of Data Controller:	<b>4iG Public Limited Company</b>
Company registration number of Data Controller:	<b>01-10-044993</b>
Head office of Data Controller:	<b>8 Montevideo str., 1037 Budapest</b>
Electronic address of Data Controller:	<b>DPO@4ig.hu</b>
Representative of Data Controller:	<b>Gellért Jászai President and CEO</b>
Data Protection Officer:	<b>dr. Ágoston Csordás (agoston.csordas@4ig.hu)</b>

The Data Controller handles personal data in accordance with all applicable laws, but in particular with the following laws:

- Act CXII of 2011 on the right of information self-determination and freedom of information (hereinafter referred to as '**Info. Act**');
- Regulation (EU) No 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)(hereinafter referred to as '**Regulation**' or '**GDPR**').

The Data Controller treats personal data confidentially and takes all necessary technical and organizational measures to facilitate IT, information security and other secure data processing in order to preserve the confidentiality of the data.

### Concepts

The conceptual system of this notice is the same as the interpretative explanations set out in Article 4 of the Regulation and, in addition to certain points, as the interpretative provisions of § 3. of the Info. Act.

When this notice regulates data or data management, it should be understood as personal data or their processing.

## II. CHARACTERISTICS OF EACH DATA MANAGEMENT PURPOSES

### 1. COMMUNICATION-RELATED DATA MANAGEMENT

In today's fast-tracked world, the Data Controller primarily keeps in touch with partners and clients electronically, but anyone can also contact him by mail with questions. Anyone can contact the Data Controller by direct e-mail [or by postal mail or by sending a message directly on the website <https://www.4ig.hu/kapcsolat>](#), whether it is a request for information, or a technical question, or a request for quotation or any other subject.

When communicating with the data subject in any case, the Data Controller handles emails and letters as described in this notice.

#### Purpose of data management

Communication, response to inquiries from interested parties. The data provided by the data subject will only be processed by the Data Controller for the purpose of communicating with him or her or for the administration of the message.

The Data Controller initiates contact with any data subject solely in connection with the performance of a contract already in force or by any other legal basis, in compliance with the rules on data protection.

#### Personal data processed

Name, e-mail address, mailing address in case of postal mail and any other information relevant to the case initiated by the data subject according to the data subject. The data subject has the possibility to voluntarily provide his/her phone number if he/she wishes to be contacted directly by Data Controller on the telephone with his reply.

#### Legal basis for data processing

The legal basis for the processing of personal data is Article 6 paragraph (1) point (b) of the Regulation, i.e. the processing is necessary for the performance of a contract (obligation) or necessary to take action at the request of the data subject prior to the conclusion of the contract in which the data subject is one of the parties. The Data Controller considers that communication with data subjects is a prior data processing related to a contract (agreement) to be concluded later, or data processing related to a contract already concluded.

In addition, Article 6 paragraph (1) point (b) of the Regulation (legitimate interest) provides the Data Controller with a legal basis for the processing of data. It is in the legitimate interest of the Data Controller that if he is contacted in a case, then he may process the personal data necessary for his reply.

### Source of personal data

The person involved. Since the data subject is the source of the personal data, the Data Controller will provide him/her with direct information on any possible changes in the scope of the data processed when they are collected.

### Recipients of personal data provided

Personal data shall be processed only by employees of the Data Controller who have the right to propose or make decisions in connection with the message sent by the data subject or in connection with the administration required on the basis of the message.

### Data processor(s):

For the processing of data, the Data Controller uses the following data processors:

**Microsoft Corporation** (One Microsoft Way, Redmond WA, USA 98052) – e-mail service provider of the Data Controller (Office 365).

**Amazon Web Services EMEA SARL** (38 Avenue John F. Kennedy, L-1855, Luxembourg, Registration Number: B186284, VAT ID: LU 26888617, <https://aws.amazon.com/>, [https://aws.amazon.com/contact-us/?nc2=h\\_header](https://aws.amazon.com/contact-us/?nc2=h_header)) - hosting provider of the website.

**Kinsta Inc.** (8605 Santa Monica Blvd #92581 West Hollywood, CA 90069, United States, [legal@kinsta.com](mailto:legal@kinsta.com)) – hosting provider of the website.

**Landingi Sp. z o.o.** (44-100 Gliwice, Poland ul. Witkiewicza 6, VAT ID: PL6762461659) - hosting provider of the website.

**Ambrus Péter E.V.** (7632 Pécs, Enyezd út 7. 2/9., mail: [ugyfelszolgalat@premiumwp.hu](mailto:ugyfelszolgalat@premiumwp.hu), <mailto:ugyfelszolgalat@premiumwp.hu>, phone: +36 70 209 3432) – operation of the website on behalf of the Data Controller

**ShiwaForce.com Ltd.** (17-19 Alkotás str., 1123 Budapest) - develops and maintains the website on behalf of the Data Controller.

The processors may process personal data only for the purposes specified by the Data Controller and stipulated in the contract, in accordance with the instructions of the Data Controller, and they do not have the right to decide on the processing independently.

Processors have undertaken confidentiality and contractual guarantees on the retention of personal data they got to know in the performance of their duties.

The guarantees accepted by Microsoft Corporation as a data processor complying the data processing contract in accordance with Article 28 of the Regulation were entered into the 'Additions to Data Protection' document annexed to the Service Agreement. The 'Additions to Data Protection' document is available for e.g. in Hungarian, on the following website:

<https://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=2&Keyword=DPA>

### Transfer of personal data to a third country or international organization

Personal data will not be transferred directly by the Data Controller to a third country or international organization, but personal data may be transferred by the service provider of the Office 365 e-mail system, Microsoft Corporation as a data processor to the United States or any other country in which Microsoft Corporation or other subsidiary data processors operate. The transfer of data shall be carried out by Microsoft Corporation in accordance with Chapter V of the Regulation, using model contracts as defined by the competent body of the European Union, subject to additional technical and organizational measures. For more information about the transfer of data and the technical and organizational measures used, Microsoft Corporation provides detailed information in the 'Additions to Data Protection' document. This document is available on the official website of Microsoft Corporation:

<https://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=3&DocumentTypeld=67>

### Duration of processing of personal data

If a contract (agreement) of any kind is concluded between the Data Controller and the data subject, the personal data which come to his knowledge during the communication will be processed by the Data Controller in connection with that contract, up to the expiry of the limitation period.

If, after the pre-contract data processing, no contract or agreement is concluded between the Data Controller and the data subject, or if the communication is not related to a contract and the communication cannot have any future legal effect, then the personal data received during the communication will be processed by the Data Controller until the final conclusion of the communication.

### Automated decision-making and profiling

None of this happens during data processing.

### Provision of personal data

Processing of personal data is a condition for replying to the message and thus for communication between the data subject and the Data Controller.

## 2. ISSUING AND KEEPING INVOICES

### Purpose of data processing

The purpose of the data processing of the Data Controller is to issue and to keep invoices

- as per Act CXXVII of 2007 on value added tax (VAT Act.) § 159 (1) and § 169, and
- as per Act C of 2000 on accounting (Acc. Act) § 169 (2).

### Personal data processed

The Data Controller's clients are generally legal persons, but they can also be natural agents and sole proprietors; the following data are considered personal data and are processed on the basis of the following.

The data specified in §169 in VAT Act., but at least:

- a) name,
- b) billing address,
- c) tax no.

### Legal basis for data processing

The legal basis for the processing of data while issuing invoices is Article 6 paragraph (1) point (c) of the Regulation, i.e. fulfilment of a legal obligation.

### Source of personal data

The affected person. Since the data subject is the source of the personal data, the Data Controller will provide him/her with direct information on any possible changes in the scope of the data processed when they are collected.

### Recipients of personal data provided

Personal data are processed only by employees of the Data Controller whose responsibility is to administer invoicing.

The company's auditor, INTERAUDITOR Ltd. (gf. 1/F. bldg. A. 16-18. Vörösmarty Str., 1074 Budapest) in the performance of his duties, may have access to data relating to invoices, in which he acts as an independent data controller.

#### Transfer of personal data to a third country or international organization

The Data Controller does not transfer the above personal data of the data subject to a third country or an international organization.

#### Duration of processing personal data

The personal data of the data subject are processed by the Data Controller according to the Acc. Act. § 169 (2) for at least 8 years from the date of issue.

#### Automated decision-making and profiling

None of this happens during data processing.

#### Provision of personal data

The processing of all data is based on legislation and is mandatory.

### **3. PROCESSING OF DATA RELATED TO THE PERFORMANCE OF CONTRACTS AND PROCESSING OF CONTACT DETAILS**

In order to use and provide the service, the Data Controller concludes contracts with other legal entities, which may be individuals as well as legal persons.

In the event that the Data Controller enters into a contract with a natural person, he will process other personal data necessary for the identification and contact of that person and related to the performance of the contract.

When the Data Controller enters into a contract with legal persons, it is necessary to process the data of the contact person of the partner in order to be able to communicate with each other during the cooperation and in order to maintain and deepen the cooperation on an ongoing basis.



## Purpose of data processing

The purpose of data processing is to conclude and perform the contract between the Data Controller and the contracting partner, including their communication related to the contract, through which a business relationship can be established and maintained.

## Processed personal data

In view of the fact that, in the case of a contract with a natural person, the source of the personal data is the data subject, the Data Controller will provide final information on the exact scope of the personal data processed at the time of conclusion of the contract. In general, in case of a natural person contracting party, the following data will be processed:

- d) name (for identification),
- e) mother's name (for identification),
- f) place of birth, time (for identification),
- g) address (for communication),
- h) in case of a self-employed person: head office (for communication),
- i) phone number (for communication),
- j) e-mail (for communication),
- k) for payment by bank transfer: bank account number, account holding bank,
- l) if the commission fee is paid after deduction of taxes and dues, then the data management of the social security number is also necessary,
- m) tax identification number in case of onerousness, VAT number in case of a self-employed person,
- n) registration number in case of a self-employed person,
- o) other data by all means necessary for the performance of the contract.

In case of a legal entity, the name of the representative, as well as the contact person's name, telephone number, e-mail address and position are managed by the Data Controller.

## Legal basis for data processing

Natural person: Article 6 paragraph (1) point (b) of the Regulation: performance of a contract.

If the contact person is not in a direct contractual relationship with the Data Controller, i.e. the data subject is an employee or other agent of the contracting partner, the legal basis for the data processing is the legitimate interest of the Data Controller under Article 6 paragraph (1) point (b) of the Regulation.

It is in the legitimate interest of the Data Controller to develop and maintain a business relationship with the company represented by the data subject in order to perform the contract as effectively as possible. Contacts are therefore necessary in order to develop economic cooperation and to perform the contract(s) concluded between the organizations. The data subject's personal data will not be processed by the Data Controller for any other purpose without legal basis.

### Source of personal data

If the Data Controller contracts with a natural person, the source of the personal data is the data subject. In such case, the Data Controller will provide direct information on any changes in the scope of the data processed when they are collected.

In case of a contract with a legal person, the source of the contact details is the contracting party.

### Recipients of the provided personal data

The Data Controller will only provide the personal data of the data subject to his/her employees who are involved in the performance of the relevant legal relationship.

### Transfer of personal data to a third country or international organization

The Data Controller does not transfer the above personal data of the data subject to a third country or an international organization.

### Duration of processing personal data

The Data Controller will process the personal data of the data subjects until the expiry of the general limitation period laid down in the Civil Code after the performance of the contract, provided that the contract, if it constitutes an accounting document directly and indirectly supporting the accounting of accounts, is retained by the Data Controller for at least 8 years in a legible form in accordance with § 169 (2) of Act C on Accounting of 2000, which can be retrieved by reference to the accounting records.

Contact data will no longer be processed by the Data Controller for the contact purposes set out in this notice if he/she is informed that the contact person's employment relationship with the contracting partner has ceased.

### Automated decision-making and profiling

None of this happens during data processing.

### Provision of personal data

Personal data is mandatory for the conclusion and performance of the contract.

## **4. CONDUCT OF RECRUITMENT PROCEDURES, EVALUATION OF JOB APPLICATIONS**

### Purpose of data management

Conducting the selection process for the advertised post and learn about the professional and human characteristics, educational qualifications and previous work experiences of the candidates during the selection process in order to find the person most suitable for the vacancy.

### Personal data processed

Information provided by the data subject in a CV or in a motivational letter. If the data subject sends further personal data to the Data Controller, he will also process it as described in this notice. If certain documents are not required by the Data Controller for the assessment of the data subject's application, they will be immediately deleted or destroyed.

If the data subject is applying for a job for which obtaining a qualification, license or certification is a prerequisite, then the Data Controller shall examine the relevant data.

### Legal basis for data processing

The processing of personal data is necessary to take action at the request of the data subject prior to the conclusion of the contract, so the legal basis for the processing is Article 6 paragraph (1) point (b) of the Regulation.

When the data subject sends his/her application for the advertised job to the Data Controller, (s)he expresses a clear will to fill the post and to participate in the necessary selection process. A necessary part of the selection process is that the applicant's professional and personality characteristics are assessed in advance by the employer in order to be able to assess whether the applicant is suitable for the job.

### Source of personal data

The source of the personal data is the data subject applying for the advertised job. As the data subject is the source of the personal data, the Data Controller will provide him/her

with direct information on any changes in the scope of the data processed when they are collected.

### Recipients of the provided personal data

Personal data are processed only by employees of the Data Controller who have the right to propose or make decisions in connection with the filling of the advertised post.

### Data processor(s):

If the CV is sent by e-mail, the Data Controller will use the following data processing service:

Microsoft Corporation (One Microsoft Way, Redmond WA, USA 98052) – e-mail provider of the Data Controller (Office 365).

The data processor may process the personal data of the data subject only for the purposes specified by the Data Controller and stipulated in a contract, in accordance with the instructions of the Data Controller, and has no independent right to decide on the processing. The data processor has undertaken confidentiality and contractual guarantees for the retention of personal data that became known in the course of its duties.

### Transfer of personal data to a third country or international organization

Personal data will not be transferred directly by the Data Controller to a third country or international organization, but personal data may be transferred by the service provider of the Office 365 e-mail system, Microsoft Corporation as a data processor to the United States or any other country in which Microsoft Corporation or other subsidiary data processors operate. The transfer of data shall be carried out by Microsoft Corporation in accordance with Chapter V of the Regulation, using model contracts as defined by the competent body of the European Union, subject to additional technical and organizational measures. For more information about the transfer of data and the technical and organizational measures used, Microsoft Corporation provides detailed information in the 'Additions to Data Protection' document. This document is available on the official website of Microsoft Corporation:

<https://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=3&DocumentTypeId=67>

### Duration of processing personal data

Only until filling the vacancy is final (last day of the probation period of the selected candidate) but not more than 1 year.

### Automated decision-making and profiling

None of this happens during data processing.

### Provision of personal data

The provision of personal data is not mandatory, but it is a prerequisite for the application.

## 5. OPERATION OF SOCIAL MEDIA WEBSITES

### Social media data processing in general

Social media is the most important platform for communication in today's online world. The Data Controller wishes to report on current information, events and news related to his operation and activities via his social media pages, in addition to his website. These pages also allow for more direct contact with interested parties and for the information published by the Data Controller to reach a wider reader and viewer audience.

The Data Controller currently uses the following pages and channels:

- Facebook page: <https://www.facebook.com/4ignyrt/> (hereinafter referred to as '**Facebook Page**');
- YouTube channel: <https://www.youtube.com/channel/UCBleUsc-2g5gG6TYbkIOJcw> (hereinafter referred to as '**Channel**');
- LinkedIn page: <https://www.linkedin.com/company/4ig/> (hereinafter referred to as '**LinkedIn Page**')
- (all these collectively referred to as '**Social Media Pages**' or '**Social Networking Site**').

### Purpose of data processing

The purpose of the processing of personal data is to operate the Social Media Pages and thereby to inform interested parties by the Data Controller about current information, news and events related to his operation, activities.

The purpose of the operation of the Social Media Pages is also to provide interested parties with the possibility to express their opinions, reactions, questions and comments about the information posted on the Social Media Pages, or to contact us in the form of a private message on the Facebook Page (Messenger).

For the LinkedIn Site, an additional purpose of data management is to post job advertisements and receive job registrations through the Site.

The Data Controller is entitled to moderate content that violates the Terms of Use of the Social Networking Site or social networking sites in general (delete them from the Social Networking Site) and, if necessary, to ban persons out from the Social Networking Site who regularly and/or seriously violate these terms of use, so that the further purpose of his data processing is to moderate such offensive content and to ban those who engage in such activities from the Social Networking Site.

For the Data Controller, the operator of the Social Networking Site (see in detail below) provides the data of the page analyses (for the Channel: performance analysis) function (collectively referred to as '**Page Analyses**'). The Page Analyses function displays aggregated data to help the Data Controller understand how visitors use the Social Media Pages.

The Data Controller reserves the right to organize a promotion (e.g. sweepstakes) on the Social Networking Site. With regard to such promotional activities and related data processing, the Data Controller issues separate data management notice(s).

The Data Controller does not keep any records of the data subjects of the data processing on the Social Networking Site, or of the activities they carry out on the Social Networking Site; he does not process the personal data posted by the data subjects on the Social Networking Site in any other way than the above, and does not generally use the personal data of the data subjects for purposes other than those mentioned above.

### Processed personal data

The Data Controller will process personal data on Social Media Pages in the following cases:

- in case of following the Social Networking Site / subscription to the Social Networking Site / joining the Social Networking Site, or when unfollowing it / unsubscribing from it / exiting it, then processing the public information of the data subject's profile (profile name, profile user ID);
- in case of activity on the Social Networking Site or in connection with the Social Networking Site: information about the activity, including writing a post or review, sharing a post, commenting on a post, reaction to a post (e.g. liking a post);
- starting communication via a private message with the Social Networking Site: any information that the data subject brings to our knowledge during the communication;
- in the event of a violation of the Terms of Use of the Social Networking Site or social networking sites in general, in order to moderate the infringing content and to ban or block the affected person from the Social Networking Site: data relating

to this infringing conduct and public data relating to the profile of the data subject (profile name, profile user ID),

- only for LinkedIn Page: information provided when applying for a job vacancy posted on LinkedIn.

Personal data processed in connection with Page Analyses function:

Page Analyses function may be based on personal information collected by the Social Networking Site operator about data subjects visiting the Social Networking Site or using the Social Networking Site and its content. The scope of the personal data used for these Page Analyses is determined by the Social Networking Site operator and is only available to them. The Data Controller has no control over the scope of this personal data, he cannot influence it in any way, he has no influence on the data processing of the Social Networking Site. When we use the Page Analyses function, the Social Networking Site displays information to us only in aggregated form, as statistics, not as per individuals, so we do not process personal information related to Page Analyses.

### Legal basis for data processing

According to Article 6 paragraph (1) point (f) of the Regulation, it is the legitimate interest of the Data Controller, which has been expressed at 'The purpose of data processing'.

### Source of personal data

The data subject and the Social Networking Site.

### Recipients of the provided personal data

The Data Controller will only provide the personal data of the data subject to the employees and data processors whose job includes to manage and to operate the Social Networking Site.

### Data processor(s):

Regarding the operation of social media pages, Data Controller uses the following data processor:

**Wise Advisory Group Ltd.** (Flat 2, floor 2, building B, 9 Szemere str., 1054 Budapest – agency entrusted by the Data Controller to operate its social media pages.

The data processor may process the personal data of the data subject only for the purposes specified by the Data Controller and stipulated in the contract, in accordance with the instructions of the Data Controller, and has no independent right to decide on the processing. The data processor has undertaken confidentiality and contractual

guarantees for the retention of personal data that became known in the course of its duties.

The personal data of the data subject – with the exception of the personal data provided in the Facebook Group, LinkedIn Group, in a private message or, in case of the LinkedIn Page, during job registration – is data that the data subject posts on the public platform of the Social Networking Site, so anyone can access them. The Data Controller has no control over who exactly gets to know the data published on the Internet.

The personal data related to the Social Networking Site (e.g. a post published on a Facebook Page) displayed in the data subject's own profile may be accessed by all persons who otherwise have access to other similar data posted on the social networking site, in accordance with the data subject's user preferences. The scope of persons having access (e.g. that only friends and followers can see the published data) is set by the data subject himself in this regard.

The data published in the LinkedIn Group is also only known to members of the LinkedIn Group.

The personal data contained in a private message or, in case of the LinkedIn Page, the personal data provided during the job application will only be known to the Data Controller.

### **Transfer of personal data to a third country or international organization**

The Data Controller does not transfer the above personal data of the data subject to a third country or to an international organization, but due to the limitlessness of the Internet, the personal data (e.g. comments, evaluations) published by the data subject on the public interfaces of the Social Networking Site can be known to anyone who visits the Social Networking Site.

### **Duration of personal data processing**

The Data Controller will process personal data for as long as he is the administrator of the Social Networking Site. The Data Controller has no control over how long the data will be displayed by the Operator of the Social Networking Site.

### **Automated decision-making and profiling**

None of this happens during data processing.



## 5.1 FACEBOOK

As a stand-alone data controller, Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland, hereinafter referred to as '**Facebook Ireland**') collects data on people visiting social media sites, groups or events in accordance with its own data management policy.

Facebook Ireland's general data management notice [is available at the following link: https://hu-hu.facebook.com/privacy/explanation](https://hu-hu.facebook.com/privacy/explanation).

For privacy issues, contact Facebook Ireland's data protection officer using the following interface: <https://www.facebook.com/help/contact/540977946302970>.

### Facebook Page

The Facebook Page is a public platform, so any personal information posted there publicly can be accessed even without Facebook registration. Reactions and comments to our content on the Facebook Page can only be sent by Facebook users, reviews can only be written by them, and only they can follow the Facebook Page. Facebook registration is also required to send a message.

As administrator of the Facebook Page, the Data Controller reserves the right to moderate certain reviews and comments posted on the Facebook Page if he considers that they violate the Terms of Use of Facebook or of the Facebook Page (e.g. violent, sexual content), i.e. to delete such reviews, comments, or to ban persons from the Facebook Page who regularly and/or seriously violate the Terms of Use.

### Facebook Group

The Facebook Group can operate in a public/private (visible)/private (hidden) form. The Data Controller provides information on how the Facebook Group works in the Facebook Group description.

If the Facebook Group is in the public domain, anyone – even without a Facebook registration – can see the list of the members of the Facebook group – including whether any given person is a member of the Facebook Group or not –, as well as the given person's posts, comments, or reactions to posts or comments published in the relevant Facebook Group.

If the Facebook Group is private (visible), only members of the Facebook Group can see the list of members by names – including whether a given person is a member of the relevant Facebook Group or not –, as well as the given person's posts, comments, or reactions to posts or comments published in the relevant Facebook Group. A person

outside the Facebook Group can only know the number of members and the name and description of the Facebook Group.

If the Facebook Group is private (hidden), only members of the Facebook Group can see the list of members by names – including whether a given person is a member of the relevant Facebook Group or not –, as well as the given person's posts, comments, or reactions to posts or comments published in the relevant Facebook Group. The Facebook Group is only visible in the search engine to members, former members and invitees, and only they can know the name and description of the Facebook Group.

Facebook registration is required to join the Facebook Group.

The Data Controller, as administrator of the Facebook Group, reserves the right to moderate certain posts or comments in the Facebook Group if he considers them violating the terms of use of Facebook or the Facebook Group (e.g. violent, sexual content), i.e. to delete such posts, comments, or to ban persons from the Facebook Group who regularly and/or seriously violate the Terms of Use.

### Notice on joint data management

In connection with the Facebook Page and the Facebook Group, Facebook Ireland provides the Data Controller with the data of the Page Analyses function. In the processing of personal data used for the Page Analyses – considering Judgment C-210/16. Of the Court of Justice of the European Union –, the Data Controller and Facebook Ireland act as joint data controllers in accordance with Article 26. of the Regulation.

The joint data processing is made possible by Article 26. of the Regulation. When the purposes and means of data processing are determined jointly by two or more data controllers, they are considered to be joint data controllers.

The joint data controllers shall determine in a transparent manner, in an agreement between them, their responsibilities and the distribution of their responsibilities in relation to the fulfilment of the obligations under the Regulation, particularly in relation to the exercise of the rights of the data subject and the fulfilment of tasks of providing information. The agreement is the data management appendix of the Page Analyses function, available here: [https://hu-hu.facebook.com/legal/terms/page\\_controller\\_addendum](https://hu-hu.facebook.com/legal/terms/page_controller_addendum)

Regardless of the terms of the agreement, the data subject may exercise his or her rights under the Regulation in respect of each data controller and against each data controller.

In the course of joint data processing, all data controllers comply with the rules on data protection and on the processing of personal data.

More information about data management during Page Analyses is available here:  
[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)

## 5.2 YOUTUBE

Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter referred to as '**Google Ireland**') collects data about individuals who view specific YouTube videos as an independent data controller, in accordance with its own privacy policies. In connection with the Channel, Google Ireland provides performance analysis to the Data Controller. In doing so, the Data Controller only learns aggregated data, not personal data. More information about this is available here:  
<https://support.google.com/youtube/answer/9314414?hl=hu>.

Google LLC's privacy policy – covering all its subsidiaries – is available here:  
<https://policies.google.com/privacy?hl=hu>.

YouTube's Privacy Policy is available here:  
[https://support.google.com/youtube/answer/7671399?p=privacy\\_guidelines&hl=hu](https://support.google.com/youtube/answer/7671399?p=privacy_guidelines&hl=hu).

The Channel can be visited by anyone, and our videos and comments can be viewed by anyone. However, our content on the Channel can only be reacted by [Like/Dislike], or commented by users with a Google account, and only they can follow the Channel.

The Data Controller reserves the right to moderate certain comments posted on the Channel if he considers that they violate the Terms of Use of YouTube or of the Channel (e.g. violent, sexual content), i.e. to delete such posts, to block persons who regularly and/or seriously violate the Terms of Use.

## 5.3 LINKEDIN

LinkedIn Ireland Unlimited Company (Gardner House, Wilton Plaza, Wilton Place, Dublin 2, Ireland, hereinafter referred to as '**LinkedIn Ireland**'), as an independent data controller, collects data on persons who interact or submit a job application in the LinkedIn Group or on the LinkedIn Page in accordance with its own data management policy.

LinkedIn Ireland's general data management information is available at:  
<https://www.linkedin.com/legal/privacy-policy?src=li-other&veh=www.linkedin.com#use>

The LinkedIn Page can be visited by anyone, our content and job advertisements there can be viewed by anyone. Only users with LinkedIn accounts can like, comment on, share

or send us a private message about our content posted on the LinkedIn Page, and only users with LinkedIn accounts can apply for the job advertised by us, and only they can follow our LinkedIn Page. Comments made by the data subject to the content of the LinkedIn Page, as well as followers of the LinkedIn Page, can only be seen by users with LinkedIn accounts.

The Data Controller reserves the right to moderate certain comments posted on the LinkedIn Page if he considers that they violate the Terms of Use of LinkedIn or the LinkedIn Page (e.g. violent, sexual content), i.e. to delete such posts, to ban (to block) persons who regularly and/or seriously violate the Terms of Use.

The Data Controller informs the data subjects about the processing of job applications submitted via LinkedIn and the conduct of the recruitment procedure by making a separate data management notice available.

### LinkedIn Group

In case of the LinkedIn Group, members can only see the additional members by name with whom they are friends through their LinkedIn profile – including whether a given person is a member of the LinkedIn Group or not. Any given person's posts, comments, and reactions to posts and comments in the relevant LinkedIn Group are visible to all members of the group. A person outside the LinkedIn Group can only know the number of members and the name and description of the LinkedIn Group.

The Data Controller, as administrator of the LinkedIn Group, reserves the right to moderate certain posts and comments posted in the LinkedIn Group if he considers that they violate the Terms of Use of LinkedIn or the LinkedIn Group (e.g. violent, sexual content), i.e. to delete such comments, posts, and to ban persons who regularly and/or seriously violate the Terms of Use from the LinkedIn Group.

## 6. DATA PROCESSING RELATED TO AN ETHICS AND COMPLIANCE COMPLAINT

### Purpose of data management

4iG Plc. operates an Ethics and Compliance Line pursuant to § 13. and 14. (1) of the CLXV Act on Complaints and Public Interest Notifications of 2013 to facilitate reporting violations of the law or the Code of Ethics and Business Conduct.

4iG Plc. handles the personal data of data subjects for the purpose of receiving and investigating the complaint, of remedying or terminating the complained conduct and of informing the notifier.

### Personal data processed

- a) Name of the notifier and contact details provided by the notifier (postal address, e-mail address, telephone number)
- b) Name and other details of the natural person complained about and other personal data essential for the examination of the complaint.

### Legal basis for data processing

The legal basis for data processing is the legitimate interest of the data controller. Pursuant to § 13-16. of the CLXV Act of 2013 on complaints and public interest notifications, the data controller has a legitimate interest in managing the data related to receiving Ethics and Compliance complaints, investigating them, remedying or terminating the complained conduct and informing the notifier.

### Source of personal data

The source of personal data is the notifier, the natural person complained about and the results of the investigation.

### Recipients of the provided personal data

Personal data are processed only by employees of the Data Controller who are involved in receiving and investigating the complaint, in remedying or terminating the complained conduct or in informing the notifier.

### Data processor(s):

Microsoft Corporation (One Microsoft Way, Redmond WA, USA 98052) – e-mail service provider of the Data Controller (Office 365).

The data processor may process the personal data of the data subject only for the purposes specified by the Data Controller and stipulated in a contract, in accordance with the instructions of the Data Controller, and has no independent right to decide on the data processing. The data processor has undertaken confidentiality and contractual guarantees for the retention of personal data became known in the course of its duties.

### Transfer of personal data to a third country or international organization

Personal data will not be transferred directly by the Data Controller to a third country or international organization, but personal data may be transferred by the service provider of the Office 365 e-mail system, Microsoft Corporation as a data processor to the United States or any other country in which Microsoft Corporation or other subsidiary data processors operate. The transfer of data shall be carried out by Microsoft Corporation in accordance with Chapter V of the Regulation, using model contracts as defined by the competent body of the European Union, subject to additional technical and organizational measures. For more information about the transfer of data and the technical and organizational measures used, Microsoft Corporation provides detailed information in the 'Additions to Data Protection' document. This document is available on the official website of Microsoft Corporation:

<https://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=3&DocumentTypeId=67>

### Duration of processing personal data

If, on the basis of the investigation, it is established that the complaint is unfounded or that no further action is necessary, the data controller shall delete the personal data of the data subject within 60 days from the end of the investigation.

If action is taken on the basis of the complaint, including ethical or disciplinary procedures and legal proceedings, the Data Controller processes data until the final conclusion of the action taken on the basis of the complaint.

### Automated decision-making and profiling

None of this happens during data processing.

### Provision of personal data

Among the personal data, the contact details of the notifier and the name and other data of the natural person complained about are not mandatory, but the absence of these may impede the effective investigation of the complained conduct or omission and the informing of the notifier.

### III. THE RIGHTS OF THE DATA SUBJECT IN RELATION TO DATA MANAGEMENT

#### The right to be informed

The data subject has the right to be informed on the data processing, which the Data Controller performs by providing this notice.

#### Consent-based data processing

If the legal basis for data processing is the consent of the data subject, then (s)he is entitled at any time to withdraw his or her prior consent to data processing. However, it is important to know that withdrawal of consent should only apply to data processing which has no other legal basis. If there is no other legal basis for the processing of the personal data concerned, the Data Controller will permanently and irrevocably delete the personal data after the withdrawal of consent. Withdrawal of consent, as per the Regulation, shall not affect the lawfulness of data processing carried out on the basis of consent prior to the withdrawal.

#### The right of access

At the request of the data subject, the Data Controller shall at any time provide information on whether the data subject's personal data are being processed or not, and if so, provide access to the personal data and to the following information as well:

- a) purposes of data processing;
- b) categories of relevant personal data;
- c) categories of recipients or recipients with whom the Data Controller has communicated or to whom he will disclose personal data, including in particular third-country recipients or international organizations;
- d) the intended duration of keeping personal data or, if this is not possible, the criteria for determining that period;
- e) the data subject is also informed of his/her right to request the Data Controller to correct, delete or restrict the processing of personal data relating to him or her and to object to the processing of such personal data;
- f) the right to file a complaint addressed to a supervisory authority or to initiate legal proceedings;
- g) if Data Controller did not collect the data directly from the data subject, then he should provide all available information on the source of the data;
- h) if there is automated decision-making, the fact of this, including profiling, should be disclosed, and at least in these cases, the logic used as well, i.e. the importance of such processing and the likely consequences of it for the data subject.

### The right to correct personal data

The data subject shall have the right at any time, at his/her request, to correct inaccurate personal data relating to him or her without undue delay. Taking into account the purpose of the processing, the data subject is also entitled to request the supplementing – including by means of a supplementary declaration – of incomplete personal data.

If a request is made for correction (modification) of the data, the data subject shall substantiate the validity of the data correction request and the data subject shall also prove that (s)he is entitled to request data correction. This is the only way the Data Controller can assess whether the new data is valid, and if so, whether he can correct the previous data.

Furthermore, the Data Controller draws attention to the fact that the data subject should report any change in his/her personal data as soon as possible, thereby facilitating the lawful processing of data and the enforcement of his/her rights.

### The right to delete personal data

At the request of the data subject, the Data Controller is obliged to delete the personal data related to the data subject without undue delay if one of the following reasons exists:

- a) the Data Controller no longer needs the personal data for the purpose because of which they were collected or otherwise processed;
- b) in case of data processing based on consent, the data subject withdraws the consent on which the processing is based and there is no other legal basis for data processing;
- c) the data subject objects to data processing and there is no overriding legitimate reason for the data processing, or the data subject objects to the data processing for the purposes of direct marketing;
- d) personal data are unlawfully processed by the Data Controller;
- e) personal data must be deleted in order to comply with the legal obligation imposed on the Data Controller by a law of the European Union or of a Member State;
- f) personal data were collected in connection with the provision of information society services.

### The right to restrict data processing

The data subject has the right to request the Data Controller to restrict the data processing if one of the following is fulfilled:

- c) the data subject disputes the accuracy of the personal data; in this case, the limitation applies to the time period that allows the Data Controller to verify the accuracy of the personal data;



- d) the data processing is unlawful, and the data subject opposes to the deletion of the data, instead (s)he requests restrictions on their use;
- e) the Data Controller no longer needs the personal data for the purposes of data processing, but the data subject requires them for the purpose of presenting, asserting/enforcing or defending his or her legal claims; or
- f) the data subject objected to the data processing; in this case, the limitation applies to the time period until it is established whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the data subject, or not.

### The right to object

When the processing of personal data is in the legitimate interest of the Data Controller [Article 6 paragraph (1) point (f) of the Regulation] or if the data processing is necessary for the performance of the task carried out in the exercise of the public authority conferred on the Data Controller [Article 6 paragraph (1) point (e) of the Regulation], then the data subject shall have the right to object at any time to the processing of his or her personal data for reasons relating to his or her situation, including to the profiling based on the above mentioned provisions.

If the data subject's personal data are processed by the Data Controller for direct marketing (i.e. sending letters of information), he/she is entitled to object at any time to the processing of personal data relating to him or her for this purpose, including profiling, in so far as it relates to direct marketing. If the data subject objects to the processing of his/her personal data for direct marketing purposes, then the personal data must no longer be processed for that purpose.

### Consideration of interests test

When the legal basis for the processing of personal data is the legitimate interest of the Data Controller or a third party as per Article 6 paragraph (1) point (f) of the Regulation, the Data Controller shall draw up a written 'consideration of interests test' pursuant to preamble paragraph 47 and Article 5 paragraph (2), a copy of which the data subject may request by writing to the [DPO@4ig.hu](mailto:DPO@4ig.hu) e-mail address.

### The right to data portability

The data subject shall have the right to receive the personal data relating to him or her which (s)he has provided to the Controller in a structured, widely used, machine-readable format, and shall have the right to request the Data Controller to transfer that data to another data controller if:

- a) the data processing is based on the consent of the data subject or on a contract as per Article 6 paragraph (1) point (b) of the Regulation; and
- b) the data processing is carried out in an automated manner.

## IV. PROCEDURE FOR ENFORCING THE RIGHTS OF THE DATA SUBJECT

The data subject can exercise the above rights by e-mail to the [DPO@4ig.hu](mailto:DPO@4ig.hu) address, by mail to the head office of the Data Controller or in person at the head office of the Data Controller. The Data Controller shall begin the examination and fulfillment of the data subject's request without undue delay upon receipt of the data subject's request. The Data Controller shall inform the data subject of the measures taken on the basis of the request within 30 days of its receipt. If the Data Controller is unable to comply with the request, he shall inform the data subject within 30 days of the reasons for the refusal and of the data subject's rights to take legal action.

Within five years of the death of the data subject, the rights of the data subject in his/her life as defined in this notice shall be exercised by an authorized person by a provision of administration or by a declaration to the Data Controller – if the data subject has made more than one declaration to the Data Controller, then by the most up-to-date declaration – in a public document or a private document of full probative force. If the data subject has not made a corresponding declaration of rights, his/her close relative under the Civil Code shall be entitled, even in the absence of such declarations, to assert the rights of the dead person (s)he was entitled to in his/her life within five years of the death of the data subject, i.e. the right to object as defined in Article 21 of the Regulation, the right to correct data as defined in Article 16 of the Regulation and, if the data processing had already been unlawful in the life of the data subject or the purpose of the data processing had ceased with the death of the data subject, then the right to delete data as defined in Article 17 of the Regulation and the right to restrict data processing as defined in Article 18 of the Regulation. A close relative who is the first to exercise these rights shall be entitled to enforce the rights of the data subject as per this paragraph.

## V. THE RIGHT TO TAKE LEGAL ACTION IN RELATION TO DATA MANAGEMENT

In order to exercise his or her right to judicial redress, the data subject may file a case against the Data Controller if he or she considers that the Data Controller, or the data processor or joint data controller entrusted by us or acting on our behalf, is processing his/her personal data in breach of the requirements laid down in the law on the processing of personal data or in breach of a binding Act of the European Union. The court will act out of turn in such case. The court is responsible for the adjudication of the

lawsuit. The lawsuit may also be initiated – at the choice of the data subject – at the Court of the place of residence of the data subject, or at the place of stay of the data subject or at the Tribunal (Metropolitan Court) where the head office of the Data Controller is established.

By filing a complaint with the National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH), anyone can initiate an investigation against the Data Controller on the basis that there has been or there is an imminent risk of a breach of the law in relation to the processing of personal data, or that the enforcement of his or her rights in relation to the data processing is restricted by the Data Controller or that his or her request to enforce those rights is rejected by the Data Controller. The complaint can be filed by contacting one of the following contact details:

National Data Protection and Freedom of Information Authority  
(Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH)  
Postal address: PO Box 9, 1363 Budapest  
Address: 9-11 Falk Miksa str., 1055 Budapest  
Phone: +36 (1) 391-1400  
Fax: +36 (1) 391-1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
URL: <http://naih.hu>

Budapest, 11 March, 2021.