

**GENERAL DATA PROCESSING NOTICE
ON THE RIGHTS OF NATURAL PERSONS
WITH REGARD TO THE PROCESSING OF THEIR PERSONAL DATA**

**CRYSTAL-DENTAL FOGÁSZATI
KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG**

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Introduction

REGULATION (EU) 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 (hereinafter as "Regulation") rules that the controller shall take appropriate measures to provide any information to the data subject on the processing of personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language, furthermore, the controller shall facilitate data subject's exercise of his or her rights.

Act CXII of 2011 on Informational Self-Determination and Freedom of Information also requires the data subject to be notified in advance.

With the information provided below, we fulfill our legal obligation as required by law, and clarify some important definitions. In view of the above:

- a. **personal data**: any information relating to an identified or identifiable natural person (hereinafter as 'data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- b. **special data (special categories of personal data)**: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the genetic data, biometric data used for the purpose of uniquely identifying a natural person, the data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.
- c. **data subject**: any natural person identified or identifiable on the basis of a particular personal data.
- d. **recipient**: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not (persons authorized to access the data).
- e. **processing**: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; Unless specifically regulated otherwise, processing shall also mean the processing of the data.
- f. **controller**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- g. **processor**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

This notice shall be published on the website of our Company and, in addition, shall forward it to you on your request.

I. Identification of the controller

1. Controller: as per Article 4(7) of the Regulation, the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

2. This notice was issued by the Controller, who is (hereinafter as: Company)

Name of company: Crystal-Dental Fogászati Kft.
Registered seat: 1051 Budapest, Erzsébet tér 1.
Telephone: +36 1 951 3454
E-mail address: info@crystaldental.hu
Website: www.crystaldental.hu

II. Identification of the processors

3. Processor: according to Article 4(8) of the Regulation, a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

4. Your consent is not required, but you shall be notified when a processor is engaged. With regard to this we inform you of the following:

Accounting service provider

5. Our Company engages the services of a processor for the performance of its tax and accounting related obligations through an accounting services contract, in the framework of which - for the duration of the contract - it shall process the personal data of natural persons that are in a contractual or payment-related relationship with our Company, for the purposes of performing the tax and accounting obligations of our Company pursuant to the provisions of Section 169 of Act CXXVII of 2017 on Value Added Tax, and Section 167 of Act C of 2000 on Accounting.

6. Processor (hereinafter as Accountant):

Name of company: TALENTUM HUNGARY Kereskedelmi és Szolgáltató Kft.
Registered seat: 1134 Budapest, Gidófalvy L. u. 33-35 III/4.
Telephone: +36 1 239 7038
E-mail address: agi@adofarago.hu

Banking service provider

7. Our Company engages the services of a financial institution to process the data of natural persons who are in a contractual relationship with the Company as buyers or suppliers, in relation to account-related financial transactions carried out by means of a bank card, bank transfers or in any other method of payment, for which the legal basis is performance of an agreement. The financial institution - for the duration of our agreement with it - shall carry out the processing related to financial transactions.

8. Processor (hereinafter as Bank):

Name of company: CIB Bank Zrt.
Registered seat: 1027 Budapest, Medve u. 4-14.
Telephone: +36 1 423 1000
Fax number: +36 1 489 6500
E-mail address: cib@cib.hu

Contracted health funds

9. Our Company, in order to provide the most suitable service to you, in compliance with our General Terms and Conditions, has entered into a partnership agreement with a number of health fund providers who may process your personal data with regard to the costs related to your treatments, for the duration of our contract with them.

10. Processors (hereinafter as Health Fund):

Name of company: Generali Egészség-és Önsegélyező Pénztár
Registered seat: 1066 Budapest, Teréz krt. 42-44.
Telephone: +36 1 452 5444
Fax number: +36 1 452 3570
E-mail address: egeszsegepenztar.hu@generali.com

Name of company: Medicina Egészség- és Önsegélyező Pénztár
Registered seat: 1037 Budapest, Montevideo u. 5.
Telephone: +36 1 248 2270
Fax number: +36 1 319 5333
E-mail address: egeszsegepenztar@medicinapenztar.hu

Name of company: MKB-Pannónia Egészség- és Önsegélyező Pénztár
Registered seat: 1056 Budapest, Váci u. 38.
Telephone: +36 1 268 7614
Fax number: +36 1 268 7002
E-mail address: adatvedelem@mkbep.hu

Name of company: PRÉMIUM Önkéntes Egészség- és Önsegélyező Pénztár
Registered seat: 1138 Budapest, Váci út 135-139.
(As of September 1, 2018: 1138 Budapest, Dunavirág u. 2-6.)
Telephone: +36 1 999 9696
Fax number: +36 1 288 6061
E-mail address: adatvedelem@premiumpenztarak.hu

Name of company: OTP Országos Egészség- és Önsegélyező Pénztár
Registered seat: 1051 Budapest, Mérleg u. 4.
Telephone: +36 1 366 6555
Fax number: +36 1 429 7478
E-mail address: adatvedelem@otpep.hu

Name of company: Patika Egészségpénztár
Registered seat: 1022 Budapest, Bimbó út 18.
Telephone: +36 1 210 9790
Fax number: +36 1 210 9778
E-mail address: ugyfelszolgalat@patikapenztar.hu

Name of company: TEMPO Egészség- és Önsegélyező Pénztár
Registered seat: 1025 Budapest, Nagybányai út 92.
Telephone: +36 1 382 7649
E-mail address: adatvedelem@egeszsegpenztar.hu

Name of company: VITAMIN Egészségpénztár
Registered seat: 1023 Budapest, Bécsi út 4.
Telephone: +36 1 304 2278
Fax number: +36 1 214 2224
E-mail address: vitaminep@vitaminep.hu

Work safety provider

11. Our Company engages the services of a work safety provider for the purposes of fulfilling the periodical work safety obligations prior to the commencement of the work and in relation to the work. The service provider, for the duration of our contract with it, shall process the personal data of the employees.

12. Processor (hereinafter as Work Safety):

Name of company: Tűzparipa Tűz- és Munkavédelmi Szolgáltató Kft.
Registered seat: 1203 Budapest, Korom u. 5.
Telephone: +36 30 982 8040
E-mail address: info@tuzparipa.hu

IT Service Provider

13. Our Company engages the services of an information technology provider for the purposes of maintaining and managing its website, and an e-mail service provider for the purposes of providing electronic correspondence, which, in the framework of, and for the duration of our contracts with them, shall process the personal data provided on the website by the visitors of the website, and shall also process the personal data in relation to e-mail correspondence. The operation carried out by the processor is the storage of personal data on servers.

14. Processor (hereinafter as IT Service Provider):

Name of company: Webparadicsom Media Group Kft.
Registered seat: 1027 Budapest, Bem József u. 9.
Telephone: +36 1 445 2255
Fax number: +36 1 445 2256
E-mail address: info@webparadicsom.hu

Postal services, delivery, sending parcels

15. Our Company engages the services of the state-owned postal company for the delivery of parcels to the natural persons it is in connection with. Our Company shall provide this processor with the personal data necessary for the delivery (name and delivery address of recipient) and it shall carry out the delivery based on these.

16. Postal provider (hereinafter as Post):

Name of company: Magyar Posta Zrt.
Registered seat: 1138 Budapest, Dunavirág u. 2-6.
Telephone: +36 1 767 8282
E-mail address: ugyfelszolgalat@posta.hu

III. Data protection officer

17. The main activities of our Company include processing operations which require the large-scale, regular and systematic tracking of data subjects. Our Company engages the services of a Data Protection Officer through a services contract to ensure the lawful processing of your personal data and to enable you to fully exercise your rights.

18. The Data Protection Officer (hereinafter as Data Protection Officer):

Name: dr. Pataki Dezső
Telephone: +36 30 247 0635
E-mail address: iroda@clear-s.hu

19. You may turn to the Data Protection Officer in any issue regarding the processing of your personal data and the exercising of your rights.

20. The Data Protection Officer is bound by a non-disclosure obligation when carrying out his or her duties and is bound by an obligation to handle data confidentially.

IV. The processing activity of the Company***Processing the data of candidates applying for work,
tenders, curriculum vitae***

21. Our Company processes the personal data of natural persons applying for employment with our company based on the curriculum vitae and other documents submitted to us in order to determine their suitability for a position, based on the consent of the data subject.

22. The following personal data are processed: name, date and place of birth of the natural person, mother's name, address, data related to qualifications and education, professional experience, phone number(i) and e-mail address(i).

23. We process the personal data for the purpose of assessing the application and entering into a labor contract with the selected candidate until the assessment of the application has been completed. We shall

inform the data subject who was not selected for the position by our Company and at the same time shall erase the personal data of every data subject with whom our Company has not entered into a labor contract.

24. The recipients or categories of recipients of the personal data: the entity with employer rights and the persons carrying out employment tasks at the Company.
25. Differently from clause 23, our Company may process the personal data of the data subject for a period of one year for the purpose of establishing a potential employment relationship with him or her, based on the explicit, unequivocal and voluntary consent of the data subject. Such consent is requested from the applicants at the end of the hiring process in writing.

Processing on the basis of data subject's consent

26. Where processing is carried out on the basis of consent, we ask for your consent for the processing of your personal data when the form "Information Notice and Declaration for Patients" used in the surgeries of our Company and the medical chart related to your health status and medical history are filled out, and the information notice related to the processing is placed in the waiting room of the dental surgery of our Company.
27. Your consent covers all our processing activities carried out for the same purpose or purposes. When the processing has multiple purposes, we shall ask for your consent for all of them.
28. Our Company shall not ask for consent for the processing of personal data not necessary for the use of our services.
29. Our Company, in absence of a legal provision to the contrary, may use the personal data it acquired with your consent for the fulfillment of its legal obligations without further consent required from you, even after your consent has been withdrawn. Processing in accordance with clauses 43-45 shall specifically qualify as lawful.
30. Processing for the fulfillment of a legal obligation does not require your consent as processing in this case is required by law. In such cases, prior to the commencement of the processing, we shall notify you that the processing is compulsory, and, prior to the commencement of the processing, we shall inform you unambiguously and in detail of any fact related to the processing of your data, especially the purpose and the legal basis of the processing, the persons authorized for controlling and processing, the duration of the processing, the fact that our Company processes your personal data on the basis of a legal obligation related to it, and the persons that may have access to your data. This information shall cover your rights and remedies related to the processing, as well. In case of compulsory processing, pursuant to Section 20 S (3) of the Information Act, notification may be completed by revealing the references to the legal provisions containing the information above.
31. You have the right to withdraw your consent at any time, which shall not affect the lawfulness of the processing prior to the withdrawal. You will be informed of this prior to providing your consent.

Processing related to contracts

32. When processing occurs on the legal grounds of performing a contract, our Company shall process the personal data concerning you as our patient receiving dental treatment for the purposes of entering into, performing and terminating a contract (dental treatment), and for the purpose of providing contractual discounts. Such processing shall be carried out using the information you provided to us, with regard to the following information:
- a. your name
 - b. address
 - c. tax identification number or tax number
 - d. phone number
 - e. e-mail address
 - f. bank account number
 - g. information related to your medical status, the drugs you take, illnesses (medical history)
 - h. information related to innate and acquired medical status
 - i. information related to your lifestyle affecting your medical condition
33. The data processed according to points g) to i) of clause 32 are regarded as special data in accordance with point b) of the Introduction, and processing related to such data is based on the provisions of paragraph (52) of the preamble, and points a) to h) of Article 9 (2) and Article 9 (3) of the Regulation.
34. Such processing is lawful as well when processing is required for the performance of actions required by you prior to entering into a contract (e.g. providing dental advice, pre-treatment consultation).
35. The recipients of the personal data in clause 32 are the owners, employees of our Company carrying out customer service duties, and the Accountant, Bank, Health Fund and IT Service Provider as processors.
36. The duration for the processing of personal data: as long as the contract is valid (for as long as the dental treatment is provided), and after the termination of the contract (after dental treatment has finished) the period of time required by the laws related to the industry.
37. Prior to the commencement of the data processing, we shall inform you that the legal grounds of such processing are the performance of contract. Information can be provided at the same time when the contract is executed (when receiving the dental treatment), or in a notice placed in the waiting room of the dental surgery of our Company.

Processing in the social media accounts of the Company

38. Our Company maintains a Facebook, Instagram and Twitter account to market and promote its services.
39. The Privacy Notice of such social media sites shall be applicable for the visitors therefore our Company shall not process the personal data published by the visitors on such sites.
40. Our Company shall not accept any liability for any infringing content or comments published by the users of such social media sites. In the event that unlawful or offending content is published, our Company may, without advance notification, remove the data subject from the members of its group or delete his or her comments.

41. Our Company shall not be liable for any error, malfunction of that social media site, or any problem resulting from a change to the method of operation of its system.
42. Questions posted to our Company on social media sites cannot be regarded as complaints officially lodged with our Company.

Processing for the purpose of fulfilling tax and accounting obligations

43. Where the legal grounds of processing is the fulfillment of a legal obligation, our Company processes the data of the natural persons, and the legally required data of the representatives of legal entities, who enter into a relationship with the Company as buyers or suppliers, for the purpose of fulfilling taxation and accounting obligations for a period required by the laws related to the industry after the termination of the legal relation that initially provided the legal grounds for it.
44. With regard to the data processed, we apply the provisions of Section 169 of Act CXXVII of 2017 on Value Added Tax, and Section 167 of Act C of 2000 on Accounting.
45. The recipients of personal data: the owners of our Company and the Accountant as processor.

V. Rights of the data subject

46. Our Company shall ensure, with regard to every instance of processing, the exercise of the rights of the data subjects listed below, detailed in clauses 47-77:
 - a. right to preliminary information
 - b. right to access
 - c. right to rectification
 - d. right to erasure (“right to be forgotten”)
 - e. right to restriction of processing
 - f. right to data portability
 - g. right to object
 - h. communication of a personal data breach to the data subject
 - i. right to lodge a complaint with a supervisory authority (right to remedy from an authority)
 - j. right to an effective judicial remedy against a supervisory authority
 - k. Right to an effective judicial remedy against our Company or the processors that is in a contractual relationship with us

Right to preliminary information

47. Data subject has the right to receive information with regard to the facts and information related to the processing prior to the commencement of the processing.

*Information to be provided
where personal data are collected from the data subject*

48. Where personal data are collected by the Company from you, we shall, at the time when the personal data are obtained, provide you with all of the following information:

- a. the identity and the contact details of our Company, as the controller;
 - b. the contact details of the Data Protection Officer;
 - c. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d. where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by our Company or by a third party;
 - e. the recipients or categories of recipients of the personal data, if any;
 - f. the fact that our Company intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
49. In addition to the information in clause 48, we shall provide you with the following further information necessary to ensure fair and transparent processing, at the time when the personal data are obtained:
- a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. your right to request from the Company access to and rectification or erasure of your personal data or restriction of processing related to it, or to object to the processing of such data;
 - c. your right to data portability;
 - d. where the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - e. the right to lodge a complaint with a supervisory authority;
 - f. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and of the possible consequences of failure to provide such data.
50. Where we intend to further process the personal data for a purpose other than that for which the personal data were obtained, we shall provide you prior to that further processing with information on that other purpose and with any relevant further information as referred to in clause 49.
51. Pursuant to Article 13(4), where and insofar as you already have the information, we shall not be obligated to provide you that information or shall provide only the missing information.

*Information to be provided
where personal data are not collected from the data subject*

52. Where personal data are not collected from you by the Company, we shall, after the personal data are obtained, provide you with all of the following information:
- a. the identity and the contact details of our Company, as the controller;
 - b. the contact details of the Data Protection Officer;
 - c. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d. the categories of personal data concerned;
 - e. the recipients or categories of recipients of the personal data, if any;

- f. the fact that the controller intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
53. In addition to the information in clause 52, to the extent necessary, we shall provide you with the following further information necessary to ensure fair and transparent processing:
 - a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. where the processing is based on point (f) of Article 6(1), the legitimate interests of our Company or the third party;
 - c. your right to request from the Company access to and rectification or erasure of your personal data or restriction of processing related to it, or to object to the processing of such data;
 - d. your right to data portability;
 - e. where the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - f. the right to lodge a complaint with a supervisory authority;
 - g. the source of the personal data and whether they have been acquired from publicly available sources.
54. We provide the information required by clauses 52-52 as per the following:
 - a. within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
 - b. if the personal data are to be used for communication with you, at the latest at the time of the first communication to that data subject;
 - c. if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.
55. Where we intend to further process the personal data for a purpose other than that for which the personal data were obtained, we shall provide you prior to that further processing with information on that other purpose and with any relevant further information as referred to in clause 53.
56. Our obligation to provide information does not apply where:
 - a. you already have that information;
 - b. the provision of such information proves impossible or would involve a disproportionate effort, in which cases our Company shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests;
 - c. obtaining or disclosure is expressly laid down by Union or Hungarian law to which the Company is subject, and which provides appropriate measures to protect the data subject's legitimate interests;
 - d. the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Hungarian law, including a statutory obligation of secrecy.

Right of access by the data subject

57. You have the right to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:
- a. the purposes of the processing;
 - b. the categories of personal data concerned;
 - c. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - d. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e. your right to request from our Company the rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing;
 - f. the right to lodge a complaint with a supervisory authority;
 - g. where the personal data were not collected from you, any available information as to their source;
58. Where personal data are transferred to a third country or to an international organization, you shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of the Regulation relating to the transfer.
59. Our Company shall provide a copy of the personal data undergoing processing to you free of charge. For any further copies requested by you, we may charge a reasonable fee based on administrative costs. If you made the request by electronic means, and unless requested by you otherwise, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Right to erasure ("right to be forgotten")

60. You have the right to obtain from us the erasure of your personal data without undue delay and our Company shall have the obligation to erase your personal data without undue delay where one of the following grounds applies:
- a. the personal data are no longer necessary in relation to the purposes for which we collected or otherwise processed it;
 - b. You withdraw your consent on which the processing is based according to point (a) of Article 6 (1), or point (a) of Article 9 (2), and there is no other legal ground for the processing;
 - c. You object to the processing pursuant to Article 21 (1) and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21 (2);
 - d. the personal data have been unlawfully processed;
 - e. the personal data have to be erased for compliance with a legal obligation in Union or Hungarian law to which our Company is subject;
61. Where we have made the personal data public and are obliged pursuant to clause 60 to erase the personal data, taking account of available technology and the cost of implementation, we shall take reasonable steps, including technical measures, to inform further controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Right to restriction of processing

62. You have the right to obtain from us the restriction of processing where one of the following applies:
- a. you contest the accuracy of the personal data; in which case restriction is for a period enabling the Company to verify the accuracy of the personal data;
 - b. the processing is unlawful, and you oppose the erasure of the personal data and you request the restriction of their use instead;
 - c. The Company no longer needs the personal data for the purposes of the processing, but they you require them for the establishment, exercise or defense of legal claims;
 - d. You have objected to the processing pursuant to Article 21 (1) of the Regulation; in this case restriction is for the period necessary to verify whether the legitimate grounds of the Company override your legitimate interests.
63. Where processing has been restricted under clause 62, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.
64. Our Company shall inform the data subject who has obtained restriction of processing pursuant to clause 62, before the restriction of processing is lifted.

Right to data portability

65. You have the right to receive the personal data concerning you, which you have provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance the Company, where:
- a. the processing is based on consent pursuant to point (a) of Article 6 (1) or point (a) of Article 9 (2) or on a contract pursuant to point (b) of Article 6 (1); and
 - b. the processing is carried out by automated means.
66. In exercising your right to data portability pursuant to clause 65, you shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
67. The exercise of the right referred to in clause 65 shall be without prejudice to the right to erasure (right to be forgotten) in Article 17 of the Regulation and clauses 60-61 of this Notice and shall not adversely affect the rights and freedoms of others.

Right to object

68. You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6 (1) (processing is necessary for the performance of tasks in the public interest or when exercising the public authority vested in the controller) or point f) (processing is necessary for the pursuit of legitimate interests by the controller or third party), including profiling based on the aforementioned provisions.
69. Should you wish to exercise your rights determined in clause 68, your personal data shall no longer be processed, unless processing is necessary for compelling legitimate grounds which override your interests, rights and freedoms or which are necessary for the establishment, exercise or defense of legal claims.

70. Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, we shall no longer process your personal data for such purposes.
71. We shall the rights defined in clauses 68 and 70 at the latest at the time of the first communication with you, and we shall present it clearly and separately from any other information.

Communication of a personal data breach to the data subject

72. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, we shall communicate the personal data breach to you without undue delay.
73. The communication to you referred to in clause 72 shall describe in clear and plain language the nature of the personal data breach and according to points (b), (c) and (d) of Article 33 (3), we shall
- a. at least inform you of the name and contact details of the data protection officer or other points-of-contacts that can provide further information;
 - b. describe the likely consequences of the personal data breach;
 - c. describe the measures taken or proposed to be taken by our Company to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.
74. The communication to the data subject referred to in clause 72 shall not be required if any of the following conditions are met:
- a. Our Company has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access it, such as encryption;
 - b. we have taken subsequent measures which ensure that the high risk to your rights and freedoms referred to in clause 72 is no longer likely to materialize;
 - c. it would involve disproportionate effort, in which case there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

Right to lodge a complaint with a supervisory authority

75. Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, if you consider that the processing of personal data relating to you infringes this Regulation.

***Right to an effective judicial remedy against a controller
or processor***

76. Without prejudice to any available administrative or non-judicial remedy, you have the right to an effective judicial remedy where you consider that your rights under this Regulation have been infringed as a result of the processing of your personal data in non-compliance with this Regulation.
77. Proceedings against our Company or a processor engaged by us shall be brought before the courts at the location where our Company or processor has an establishment.

VI. Lodging a request by data subject measures taken by the controller

Measures based on the request of data subject

78. Our Company shall, without undue delay and in any event within one month of receiving your request to exercise your rights, provide information to you on the action taken on your request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We shall inform you of the fact that the deadline has been prolonged within one month of receiving your request, providing the reasons for the delay.
79. Where you submitted your request by electronic means, we shall attempt to provide this notification by electronic means, unless you request otherwise.
80. If we do not take action on your request, we shall inform you without delay and at the latest within one month of receipt of your 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.
81. Information provided under Articles 13 and 14 and any communication and any actions taken under Articles 15 to 22 and 34 of the Regulation shall be provided free of charge. Where your requests are manifestly unfounded or excessive, in particular because of their repetitive character, our company, with respect to the administrative costs related to the provision of the information and the taking of action, may either:
- a. charge a fee of HUF 10,000, or
 - b. refuse to act on the request.

We shall attach a description of the conditions that prove the manifestly unfounded or excessive character of the request to your request.

82. Where we have reasonable doubts concerning your identity, we may request the provision of additional information necessary to confirm your identity.
