

Controller's Name: Interton Elektroakusztikai Korlátolt Felelősségű Társaság (Interton Electroacoustic Ltd.)
Company seat: 1119 Budapest, Major utca 63.
Premises: 1119 Budapest, Major utca 17.
Tax Number: 10448962
Company Registration No: 01-09-678604

1 General Regulations

Interton Elektroakusztikai Korlátolt Felelősségű Társaság (Interton Electroacoustic Ltd) (hereafter: Company) in all cases provides lawfulness and expediency of data management regarding private data. The goal of this information note is that those visiting the website can get proper information on under what conditions and guarantees their personal data are processed by the Company and for how long. Our company shall in all circumstances keep the regulations described in present information note, in all cases when personal data are used and shall be bound by what is written here. The procedures of other data processing regarding the Company are included in our Data Protection and Security Code, which is available in our premises.

However, we shall be entitled to change this unilateral legal notice. In this case, data subjects shall be informed in advance. Should you have any questions regarding the information in this document, do not hesitate to contact us. Data processing of the Company shall be based on voluntary consent, and in some cases, data processing is required prior to entering the contract, to make steps on the request of the data subject.

Our data processing is in accordance with the legislations, in particular those below:

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereafter: "Law"),
- Regulation of the European Parliament and the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data and on repealing Directive 95/46/EC (General Data Protection Regulation, hereafter: "GDPR")

Regarding our data processing on our website, the following information is given:

1 DATA PROCESSING REGARDING REGISTRATIONS TO EVENTS:

On the website of our company, online registration can be made for our events: The background system connected to registration is handled by our employees.

Data Protection Controller (hereafter "Controller"): **Interton Elektroakusztikai Korlátolt Felelősségű Társaság**

The goal of data processing: making event organisations more effective.

Legal basis of data processing: preliminary consent by the person to be registered.

The scope of the processed personal data: surname and first name, corporate name, email address, hobbies.



The period of data processing: until the realisation of the goal or until the data subject requests for erasing. Regarding events, data subjects are informed in a dedicated data processing information note available on our website.

2 SERVER LOGGING / WEBSITE MANAGEMENT TASKS

Our company uses the help of an IT service provider below under the following conditions:

When visiting <http://www.intertongroup.com> web page, the web server automatically logs the user's activities.

The goal of data processing: during visiting the site, the service provider logs visitor's data to check the operation of services and to prevent misuse.

Legal basis of data processing: Section 6 (1) f) of GDPR. Our company has legal interest for the safe operation of the website.

Types of processed personal data: identification number, date, time and the address of the visited page.

Duration of data processing: maximum 90 days.

Name of Data Processor:

NAME OF COMPANY: DOBAI FERENC JÁNOS SOLE TRADER

COMPANY SEAT: 82 SZUGLÓ UTCA 1141 BUDAPEST.

REGISTRATION NUMBER: 50531967

TAX NO. 67637553-1-42

TELEPHONE: +36/70777-3062

NAME OF REPRESENTATIVE: DOBAI FERENC JÁNOS

EMAIL: info@joy-design.hu

WEBSITS: joy-design.hu

Further information: data emerged from analysing logfiles shall not be connected to other information and users shall not be identified by our company. The address of the visited webpages and the date and time data are not suitable for identifying the data subject, but by connecting them to other data (e.g., those given during registration) it may be suitable to make conclusions on the user.

Data processing regarding logging by the external service provider:

The html code of the portal contains links coming from an external server and leading to external servers independent from our company. The server is directly connected to the consumer's computer. Please note that the provider of the link can collect user data (e.g., IP address, data of the web browsers and OS, cursor movements, the address of the visited site and the date of the visit) due to connecting to their server directly and their direct communication with the user's web browsers. The IP address is a number sequence, with which the computers or mobile devices of the user hooked on the net can be exactly identified.

With the help of the IP address, the visitor using a particular computer can even be localised geographically. The address of the visited site and the date and time data alone are not suitable for identifying the data subject, but by connecting other data (e.g., those given during registration) they may be suitable to make conclusions on the user.

3 DATA PROCESSING REGARDING QUOTATION REQUESTS:

Our company makes it possible that our partners can request quotation electronically.

Controller: **Interton Elektroakusztikai Korlátolt Felelősségű Társaság**

The goal of data processing: preliminary inquiry on our services / products

Legal basis of data processing: our prospective partner's preliminary consent, Section 6 (1) a) of GDPR, and the data processing required before concluding the contract to make the needed steps Section 6 (1) b) of GDPR.

The scope of the processed personal data: surname and first name, telephone number, email address,

Duration of data processing: 2 years

Utilisation of data processor (hereafter "Processor"): our company calls in an IT service provider to operate the online quotation request system in accordance with section 1 of this information notice.

The rights of the data subject: the data subject (the person whose data is processed by our company) may

- request the access to their own personal data,
- request correcting them,
- request deleting them,
- in case the conditions in Section 18 of GDPR are valid, request to restrict processing personal data (that is: that the Company shall not erase or destroy the data until summoning a court or authority, but no longer than 30 days, moreover, not process data for other purpose),
- protest against processing personal data,
- practise the right for moving data under this latter right, the data subject has the right to get the personal data referring to him or her in Word or Excel format, furthermore, he or she is entitled that these data be transferred to another controller by the Company on his or her request.

Other information regarding data processing: our company shall do all technical and organisational steps to avoid a casual security incident (e.g., damage in, or loss of files containing personal data or access by unauthorised people). In the event of notwithstanding incident, we shall keep record to check the steps and to inform data subjects. The record shall contain the scope and number of data subjects in the data protection incident, the time, the circumstances, effects of the incident as well as the steps taken to avert it and the other data defined in the regulations of data processing.

The company has entered a data processing contract for data processing tasks, in it, the Processor undertakes that in case of utilization of further processors, he or she shall compulsorily use the data protection and data processing guarantees prescribed for him or her in the Data Processing Contract, in this respect, the rightful management of personal data shall be provided in case of the Processor.

4 MANAGING COOKIES



Processors place small data packages called cookies in the user's computer for tailored service and during another visit, they read them back. If the browser sends back an earlier saved cookie, the service provider managing cookies has the chance to connect the visitor's current visit to the earlier ones but only regarding exclusively their contents.

The goal of data processing: identifying, tracking, differentiating users, identifying the current working process of users, storing data given then, preventing data loss, web analytical measurements, tailored service.

Legal basis of data processing: the consent of data subjects

The scope of processed data: identification number, date, time and previously visited pages.

Duration of data processing: maximum 90 days.

Further information on data processing: Users can delete cookies from their computer and they can ban the use of cookies in their browsers. Managing cookies can usually be done in the menu Tools/Settings, under Data Security / history / Custom settings, cookie or tracking.

Possible consequences of not supplying data: unfeasibility of utilisation of the service regarding the services above described in points 2-5.

5 OTHER DATA PROCESSING

We shall inform data subjects on data processing not listed in this information note when the data are recorded. Please note that certain authorities, bodies performing public tasks, courts may request our company to give them personal data. Our company - in case the body concerned has given the exact aim and scope of data - shall hand over as many personal data insomuch as are absolutely indispensable to realise the aim of the requisition, and in case the fulfilment of the requisition is prescribed by legal rules.

6 THE METHOD OF STORING PERSONAL DATA AND THE SECURITY OF DATA PROCESSING

The IT systems and other data storing places of the Company can be found in the company seat and on the servers operated by the Processors. Our company chooses and operates the IT devices used for personal data processing while providing services so that the managed data:

- shall be available for those authorised (availability)
- the accuracy and verification shall be provided (data processing accuracy)
- its integration shall be justifiable (data integrity)
- it shall be protected against unauthorised access (data confidentiality)

We shall take exceptional care of the security of data, moreover, we shall make technical and managing steps and create the procedural regulations that are required for enforcing the guarantees in accordance with GDPR. The data shall be protected with proper measures especially against unauthorised access, changing, forwarding, publication, erasing or destruction, as well as accidental destruction, damage, and against inaccessibility due to the change of used technology.



The IT systems and networks of our company and of our partners are all protected against computer assisted fraud, computer viruses, computer intrusions and attacks leading to service refusal. The operator shall ensure security with server level and application-level protection procedures. Daily backup is solved. To avoid data security incidents, our company shall take every step that in case such an event occurs - in accordance with our incident handling code - shall do our best to immediately minimise the risks and avert damage.

7 THE RIGHTS OF DATA SUBJECTS

Data subjects may request information on how their personal data are processed, or they can request the correction of their personal data and may also ask for deleting, withdrawing their data - except for compulsory data processing - and may avail their right to data portability and protest in the way indicated at the section of data recording by contacting the Processor on the address above.

On the request by the data subject, the information is transferred in electronic form without delay but not later than within 30 days in accordance with our related Code. The request for execution of the rights below shall be free of charge.

Right for Obtaining Information

Our company shall make sufficient measures to provide each piece of information defined in Sections 13 and 14 of GDPR and each Instruction in Sections 15-22 and 34 referring to processing personal data in compact, transparent, easily comprehensible format, made up clearly and with intelligibility, and on the other hand, in an exact way.

The right to obtain information may be practiced in written form via the contacts given in point 1. The data subject may be given information in speech - on request, after certifying his or her identity.

Please bear in mind that in case an employee of our company has doubts about the identity of the data subject, we might ask for additional information to confirm the identity of the data subject.

The right for access of data subject:

The data subject is entitled to get feedback from the Processor if his or her data is being processed. If his or her personal data is being processed, the data subject has the right to gain access to personal data and the information listed below as follows:

- The goal of data processing,
- the categories of the personal data concerned,
- the recipients of the categories of recipients, whom personal data has been shared or will be shared with, including in particular recipients from third countries (outside the European Union), as well as international organisations,
- the planned period of storing personal data,
- the right for correction, deletion or restriction of data processing and the right for objection,
- the right for submitting complaints to the supervisory authority,
- information on data sources, the fact of automated decision-making, including profiling,



- as well as the information on the utilised logic, and understandable information on what importance of this data processing has and what expected consequences it may have on the data subject.

Besides those above: in case of forwarding personal data to third countries or international organisations, data subject is entitled to be informed on the proper guarantees regarding forwarding.

The right for corrigendum

Under this right, anyone may request the correction of the incorrect personal data that our company manages and the completion of defective data.

Right for deletion:

The data subject is entitled to request that the personal data related to him or her without any unwarranted delay if any of the conditions occur:

- there is no more need for the personal data for the goal that they were collected for or processed in another way,
- the data subject withdraws the consent of data processing, and there is no other legal right for data management,
- the data subject protests data processing, and there is no high-priority justifiable reason for data processing,
- unrightful management of personal data can be stated,
- personal details shall be deleted to accomplish legal obligations on processing personal data prescribed in EU or member state laws,
- collecting personal data occurred to offer services connected to information society,

Erasure of data cannot be initiated if data processing is required to as follows:

- to practise the right for freedom of speech and the right to gather information,
- to fulfil legal obligations for the Processor on processing personal data prescribed in EU or a member state, or performing tasks for public interest, or within practising public authorisation vested on the Processor,
- regarding public health, or for archiving, scientific or historic research or, for statistical reasons, based on public interest,
- or to submit, enforce or defend legal claims,

The right to restrict data processing:

If the conditions described in Section 18 of GDPR, we shall restrict data processing on the request by the data subject, that is:

- if the data subject disputes the accuracy of the personal data, in which case the limitation applies to the period during which the accuracy of the personal data can be verified.
- the processing is unlawful, and the data subject opposes the erasure of the data and instead requests that their use be restricted.
- the Company no longer needs personal data for the purpose of data processing, but the data subject requires it to present, assert or defend legal claims; or



- the data subject objected to the processing; in this case, the restriction shall apply for a period until it is ascertained,
- whether the Company's legitimate reasons take precedence over those of the person concerned.

Where data processing is subject to a restriction such personal data shall, except for the storage, be processed only with the consent of the data subject, or for the purpose of claiming, asserting or defending, on the basis of an important public interest of the European Union or a Member State. The data subject must be priorly informed on disclosing the restriction of data processing.

Right to Data Portability:

The data subject shall have the right to receive personal data relating to him or her made available to the Company in a structured, widely used, machine-readable format, and to transmit such data to another Controller. Our company shall grant such requests in Word or Excel format.

The right to protest

In case data processing occurs to direct marketing, the data subject has the right to object at any time to processing of his / her personal data for this reason, including profiling, in case it is connected to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for this purpose.

Automated decision-making in individual cases, including profiling:

Data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. The above right shall not apply if data processing:

- is necessary for entering into, or performance of, a contract between the data subject and a Controller.
- is authorised by Union or Member State law to which the Controller is subject,
- and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

The right to withdrawal

Data subject has the right to any time withdraw his or her consent. Withdrawing the consent shall not apply to the lawfulness of data processing based on the consent before the withdrawal.

Procedure rules:

Without unwarranted delay, but within one month after receiving the request, Processor shall inform data subject on the moves made under Sections 15-22 of GDPR. Considering the complexity and the number of the requests, the deadline may be extended to further two



months. Processor shall inform data subject on the extension of the deadline within one month after receiving the request, giving reasons for the delay.

If data subject has submitted the request in electronic form, the information shall be given electronically, except the data subject asks it differently.

If Controller fails to take measures on the request by data subject, Controller shall without delay but not later than within a month after receiving the request, giving reasons why measures were not taken, and that data subject may submit complaints to the supervisory authority and shall have the right to seek legal remedy at court.

Controller shall inform all the recipients on all corrections, deletions or limitations of data processing who/which the personal data were disclosed, except when it proves impossible or should require disproportionately huge effort. On request, Controller shall inform the data subject on the recipients.

Compensation and Grievance Fee

Each person who has suffered material or non-material damage as a result of breaching GDPR is entitled to receive compensation for the damage done by the Controller or the Processor. The Processor only has the liability for the damage done during data processing, if he or she did not follow the obligations defined in the regulations explicitly to the Processor, or if he or she neglected the Controller's lawful instructions or acted in the opposing way. If there are more controllers or processors or both the controller and the processor are involved in the same data management and they are responsible for the damages done during data management, each controller or processor holds joint responsibility for the whole damage.

Controller or the Processor is exempted from liability if he or she proves that he or she has no liability whatsoever.

10 JUDICIAL REMEDIES

The right for Judicial remedies, procedure of authority for data protection:

The data subject may turn to court if his or her rights were breached. The court shall handle the case with priority. Complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information.

Dated: Budapest, 24 May 2018.