

General terms and conditions

DATA SECURITY AND PRIVACY DOCUMENT OF A BHJ MÉDIAÜGYNÖKSÉG KFT.

Regulation (EC) No 2016/679 of the European Parliament and of the Council (hereinafter "the Regulation") requires the controller to take appropriate measures to ensure that each individual is provided with concise, transparent, understandable and easily accessible information on the processing of personal data. Furthermore, the controller should facilitate the exercise of the rights of data subjects.

The obligation of prior notification of natural persons (hereinafter referred to as "person/s concerned") regarding the right of information self-determination and freedom of information in Act CXII of 2011 is required by law.

This information shall be published on the website of **BHJ Médiaügynökség kft.**, but upon request, this Prospectus shall be sent to the person concerned.

NAME OF THE DATA MANAGER

The personal data of the persons concerned will be managed by **BHJ Médiaügynökség kft.** (registered address: 2040 Budaörs, Templom tér 19, tax number 25085767-213) as the Data Controller.

Representative: **TAMÁS PÁLINKÁS**

Phone number: + 36 20 910 88 82

E-mail address: palinkas.tamas@digic-it.hu

Website: www.digic-it.hu

NAME OF DATA PROCESSORS

Name, registered address: **Tárhely.Eu Szolgáltató Kft.** 1097 Budapest,
Könyves Kálmán körút 12-14
Tax number: 14571332-2-42
Email address: support@tarhely.eu

Data processing covers the storage of personal data collected and its management in a database.

PROCEDURE IN CASE OF PERSONAL DATA BRECH:

The data processor (s) should, if they become aware of a data protection incident, notify the controller without delay.

The notification must contain at least the following information:

1. a description of the nature of the data protection incident, including, where possible, the categories and approximate number of data subjects, as well as the categories and approximate number of data affected by the incident;
2. the name and contact details of the data protection officer or other contact point providing further information shall be provided;
3. a description of the likely consequences of a privacy incident;
4. a description of the measures taken or planned by the controller to remedy the privacy incident, including, where appropriate, measures to mitigate any adverse consequences that may result from the privacy incident.

If and when it is not possible to provide the information simultaneously, the information may be communicated in phases without undue further delay.

The Data Controller shall keep records of data protection incidents, stating the facts related to the data protection incident, its effects and the measures taken to remedy it. This record shall enable the supervisory authority to verify compliance with the requirements of this Article.

The Data Controller shall immediately inform the data subject about the data protection incident.

SCOPE OF PROCESSED DATA

The controller handles the following personal data in the course of its educational activities:

- Name, address, telephone number, company name, site address, billing address, and e-mail address of the customer or contact person.

DATA TRANSMISSIONS

The controller only transmits personal data towards NTCA (National Tax and Customs Administration of Hungary).

LEGAL BASIS OF DATA PROCESSING

Continuous provision of data controller activities.

DATA MANAGEMENT BASED ON LEGAL OBLIGATION

1. **BHJ MÉDIAÜGYNÖKSÉG KFT.** manages the statutory data of natural persons who enter into business relationship with it as a buyer, supplier for the purpose of fulfilling its legal obligation and for fulfilling its statutory tax and accounting obligations (accounting, taxation). The data handled are in accordance with CXXVII of 2017 on Value Added Tax. and with §169 and §202 of the Act, in particular: tax number, name, address, tax status, with §167 of Act C of 2000 on Accounting: name, address, person or organization ordering the transaction identification, signature of the authorizing officer and of the person certifying the order's execution and, depending on the organization, the inspector; signature of the recipient on the vouchers of the stock movements and on the cash management vouchers and the signature of the payer on the counter-receipts, and with Act CXVII of 1995 on Personal Income Tax: tax identification number.

2. BHI MEDIA AGENCY LTD, in fulfillment of its legal obligation, manages the personal data required by the tax laws of the persons (workers, members of their families, employees, recipients of other allowances) with whom it has a payer relationship (2017: CL. Law on Taxation (Art. 7§31)) in order to fulfill its statutory tax and contribution obligations (tax, advance payment, contributions, payroll, social security, retirement administration). The range of data to be processed is defined in Art. 50, with particular reference to the natural person's personal identification information (including previous name and title), its gender, nationality, the natural person's tax identification number and social security identification number (Social security number). To the extent that tax laws impose a legal consequence on this, **BHI MÉDIAÜGYNÖKSÉG KFT.** may manage employee health (Personal Income Tax Act. 40.§) and trade union (PIT 47.§ (2) b. /) membership information for tax and contribution (payroll, social insurance administration) purposes.
3. Period of keeping personal data: 5 years after the termination of the legal relationship giving rise to the legal basis.
4. Recipients of personal data: Employees and data processors of **BHI MÉDIAÜGYNÖKSÉG KFT.** in tax, payroll, social security (paying) functions.

DATA MANAGEMENT ON PERMANENT VALUES

1. **BHI MÉDIAÜGYNÖKSÉG KFT.** handles documents deemed to be of lasting value by Act LXVI of 1995 on Public Deeds, Archives and the Protection of Private Archival Material (Archives Act) for the fulfillment of its legal obligation. In order to preserve the lasting portion of the archives of **BHI MÉDIAÜGYNÖKSÉG KFT.** in a safe and usable condition for future generations. Time of data storage: until handed over to the archives.
2. Recipients of personal data and other data management issues are governed by the Archives Act.

DATA MANAGEMENT FOR ANTI-MONEY LAUNDERING OBLIGATIONS

1. **BHI MÉDIAÜGYNÖKSÉG KFT.**, for the purpose of fulfilling its legal obligation to prevent money laundering and terrorist financing, manages the data of its clients, their representatives and beneficial owners as defined in Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (AML Act).
 - natural person,
 - first and last name,
 - surname and forename by birth,
 - citizenship,
 - place, date of birth,
 - mother's birth name,

- their permanent address, or, failing that, their temporary address,
 - the type and number of their identification document; the number of the official identity document certifying the address, a copy of the documents presented.
2. The recipients of the personal data are: the employees of **BHJ MÉDIAÜGYNÖKSÉG KFT.** who perform customer service tasks, the head of **BHJ MÉDIAÜGYNÖKSÉG KFT.** and a person designated under Pmt.
 3. Period of storage of personal data: 8 years after the termination of the business relationship or the execution of the transaction order. (Pmt. § 56 (2))

SUMMARY INFORMATION ON THE RIGHTS OF THE CONCERNED PERSON

Right to prior information

The data subject shall have the right to be informed of the facts and information relating to the data processing prior to the commencement of data processing.

Right of access of the data subject

The data subject shall have the right to receive feedback from the Data Controller as to whether their personal data is being processed and, if so, to have access to the personal data and related information specified in the Regulation.

Right to rectification

The data subject are entitled to have the Data Controller rectify his/her incorrect personal data without delay. Taking into account the purpose of the data processing, the data subject shall have the right to request that personal data which are incomplete be corrected, by means of a supplementary declaration.

Right to erasure ('right to be forgotten')

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue if any of the reasons specified in the Regulation exist.

Right to restriction of processing:

The data subject is entitled to request that the Data Controller restrict the processing of data if the conditions specified in the order are met.

Notification obligation to correct or delete personal data or to restrict data management.

The Data Controller shall inform each recipient of any rectification, erasure or restriction, whom or which the personal data have been disclosed to, unless this proves impossible or involves a disproportionate effort. At the request of the data subject, the Data Controller shall inform those recipients.

The right to data portability

Subject to the terms and conditions set out in the Regulation, the data subject shall have the right to receive personal data relating to him or her in a structured, commonly used and machine-readable format, and to transmit those data to another Data Controller without hindrance from the Data Controller.

The right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her for (i) public interest or for exercising public authority vested in the data controller, or (ii) if processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling.

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Automated decision-making on individual issues, including profiling

The 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.

Limitations

Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12 to 22 and Article 34, as well as Article 5 in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22.

Informing the data subject about the privacy incident

If the data protection incident is likely to present a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the data subject without undue delay of the data incident.

Right to complain to the supervisory authority, right to seek redress from the authorities.

The data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his / her habitual residence, place of work or the place of the alleged infringement, if the data subject considers that the processing of his / her personal data violates the Regulation.

Right to a judicial remedy against a supervisory authority

Any natural or legal person shall have the right to an effective judicial remedy against a decision of the supervisory authority which is legally binding on him or her, or if the supervisory authority does not deal with the complaint or informs the person concerned within three months of the procedural developments or the outcome of the complaint lodged.

Right to a judicial remedy against a controller or processor

Any person concerned shall have the right to an effective judicial remedy if he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.

PRESENTATION OF THE APPLICANT'S REQUEST AND DATA PROCESSOR'S MEASURES

1. The Data Controller shall, without undue delay, but in any event within one month following the receipt of the request, inform the data subject about the measures determined in respect of your request to exercise your rights.

2. Such deadline may be extended by two months if necessary, taking into account the complexity of the request and the number of requests. The Data Subject will be notified of any extension of the deadline by the data controller within one month after the request is received, indicating the reason for the extension.
3. If the data subject submitted the request electronically, the requested information shall be made available to him/her in electronic format, unless the data subject expressly requested otherwise.
4. If the Data Controller does not take action on the data subject's request, the Data Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.
5. Information provided under Articles 13 and 14 and any communication and any actions taken under Articles 15 to 22 and 34 shall be provided free of charge by the Data Controller.
6. The Data Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.
7. If the Data Controller has reasonable doubts about the identity and competence of the natural person who submitted the request, the Data Controller may request the submission of information necessary to confirm the identity of the data subject.

DATA SECURITY MEASURES

BHJ MÉDIAÜGYNÖKSÉG KFT. shall take appropriate IT, technical and personal measures to ensure that the personal data it handles is protected against, inter alia, unauthorized access or alteration.

POSSIBILITY OF ENFORCEMENT OF DATA MANAGEMENT

If the data subject experiences unlawful processing of his / her personal data, he / she may initiate a civil lawsuit against the company in question **BHJ MÉDIAÜGYNÖKSÉG KFT.** The trial court shall have jurisdiction over the case. At the data subject's own discretion, the data protection proceedings may as well be initiated at the tribunal court at the address or temporary place of residence of the data subject.

COLLECTION OF PERSONAL INFORMATION

The **BHJ Médiaügynökség Kft.** website (hereinafter referred to as "Website") requires certain personal information for certain functions to be used. On our site we collect information directly from our visitors or through automated tools.

The data collected and processed are as follows:

- name
- e-mail address
- phone number
- place of residence

- project information
- visitor activity

The collection and processing of the above data is essential for us to provide a quality service and a great user experience.

In order to help protect your personal information, we recommend that you share only the information strictly necessary to use the features of the Website.

If you or any other user of the Website sends an email to **BHJ Médiaügynökség Kft.** for any reason, we reserve the right to record the email address provided and to provide you with future notices in accordance with this Privacy Statement. Your data will never be shared, sold or exchanged for marketing purposes.

Cookie

A cookie is a small data packet that is stored by Internet services in your browser. They aim to increase the efficiency of the online service and provide a modern user experience.

We use cookies to record our visitors' behavior and actions on the Website. We then share visitor data with trusted external social media and analytics providers and then analyze them to improve the quality of the Website and our services.

You do not have to enable cookies, but it is essential for the site to function properly and to improve the user experience. You can freely delete or disable cookies, but in this case some elements of the page may malfunction.

If you would like to delete cookies or teach your browser to delete or refuse cookies, please visit the pages recommended by your browser.

Use of Personal Information

We may use information about you, including personal information, that you shared or we recorded in order to:

1. To develop and review of our products and services. We analyze your browsing data and draw conclusions about your use of the Website and your interest in our services. We do these analyzes to improve the quality of our current and future services.
2. To communicate with you.
3. To promote things. If you choose to subscribe to our newsletter, we may send you emails on topics that are relevant / useful to you. Of course, you can unsubscribe from our email list at any time.
4. To answer your questions. In addition, we may use the information

provided by you in the contact or subscriber form to answer your questions and comments.

5. To notify you. If you provide your email address, we may inform you of the services we provide, any changes to them, and other important changes such as changes to our privacy statement.
6. To advertise. We may design and display content and promotional materials that are relevant to you.
7. To protect rights and interests. By using your information, we protect the rights and interests of ourselves, our users and any other person.
8. To comply with the law. We may use your information to comply with applicable legal or regulatory obligations, including informal solicitation from law enforcement agencies or other government agencies.
9. Other reasons: The information we collect may be used to manage our company or to perform operations that were communicated to you when we collected the information.

Option

Email - If you do not wish to receive promotional emails from our company, you can unsubscribe at any time by following the opt-out link in the email itself. Please note that it may take up to ten (10) business days for your unsubscribe request to be processed.

Cookies - You can set your computer to automatically accept all cookies, to notify you when cookies are placed on it, or to not accept cookies at all. The "Help" interface of your browser provides detailed instructions on each cookie setting.

Safety

On our site we take the necessary steps to protect the Personal and / or sensitive data transmitted from your computer, by appropriate measures, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, unavailability due to accidental destruction and damage resulting from a change in the technology used. In order to protect electronically managed data files in the various registers, it must be ensured by appropriate technical means that, unless legally allowed, the data stored in the registers cannot be directly linked to and attributed to the data subject.

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The right of users to access their personal data

You have the right to:

- Delete Data - You can ask us to delete all or part of your personal information.
- Change or correct data - You can modify your personal data. However, you may ask us to modify, update or correct your information in the event of an error or inaccuracy.
- Prohibit, Restrict, Limit Use of Information - You may ask us to stop using some or all of your personal information.
- Access and obtain your data - You may request a copy of your personal information or request us to copy your personal data in a machine-readable form.

External links

The Website may contain links to external websites and applications. The use of these links and applications is not subject to this policy and is subject to the external privacy policy of external sites. We are not responsible for the collection of information from external websites and applications.

Legal basis for data management

The legal basis for the management of Personal Data is the voluntary and appropriately informed consent of the Data subject. However, the Visitors are entitled to withdraw their consent at any time, which, however, does not affect the lawfulness of the processing of data carried out before.

Changes to the Privacy Policy

This prospectus is effective as of the effective date described below. We may change this policy from time to time. These changes will be published, including any changes to the content of the Website, so please check back regularly. If you continue to use the site of BHJ Médiaügynökség Kft. after the changes, you accept the updated privacy policy.

This Prospectus is effective from the date of issue!

Budapest, 24/02/2018.

**Represent
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Tamás
Pálincás**