

# PRIVACY POLICY

v3.2

(effective as of 2021-10-27)

## 1. General Provisions

- (1) During the processing of natural person's personal data in connection with the services provided under the Portal available through the domains vcc.live and vcc.live/hu, members of the VCC Live Group as data controllers shall act in accordance with this Privacy Policy.

By using the Portal, you agree to the provisions of this Privacy Policy.

Members of the VCC Live Group form a group of enterprises as construed for the purposes of the GDPR. The controlling undertaking shall be the undertaking that can exert a dominant influence over the other undertakings by virtue, for example, of ownership, financial participation or the rules which govern it or the power to have personal data protection rules implemented. An undertaking which controls the processing of personal data in undertakings affiliated to it should be regarded, together with those undertakings, as a group of undertakings.

### **Members of the VCC Live Group:**

#### **Data of the controlling company:**

Company name: **VCC Live Group Zártkörűen Működő Részvénytársaság**

Registered seat: Balatoni Rd. 2/A, 5th floor, Budapest, 1112 Hungary

Company register number: 01-10-141046

Mailing address: Balatoni Rd. 2/A, 5th floor, Budapest, 1112 Hungary

Electronic (e-mail) address: info@vcc.live

Tax ID: 24670023-2-43

#### **Data of controlled companies:**

Company name: **VCC Live Hungary Korlátolt Felelősségű Társaság**

Registered seat: Balatoni Rd. 2/A, 5th floor, Budapest, 1112 Hungary

Company register number: 01-09-735941

Mailing address: Balatoni Rd. 2/A, 5th floor, Budapest, 1112 Hungary

Electronic (e-mail) address: info@vcc.live

Tax ID: 13452696-2-43

Company name: **VCC Live Germany GmbH**

Registered seat: Gontardstraße 11, 10178 Berlin, Germany

Company register number: HRB 190017 B

Electronic (e-mail) address: info@vcc.live

Tax ID: DE277993151

Company name: **VCC Live Poland Sp.z.o.o**

Registered seat: UL. ZŁOTA 59., 00-120 WARSZAWA, Poland

Company register number: 0000542073

Electronic (e-mail) address: info@vcc.live

Company name: **VCC Live USA Inc.**

Registered seat: State of Delaware, Centerville Road, Suite 400, City of Wilmington,  
County of New Castle, Delaware 19808, USA

Electronic (e-mail) address: info@vcc.live

**Center of activities:** Balatoni Rd. 2/A, 5th floor, Budapest, 1112 Hungary

**The representative of the VCC Live Group:**

name: Tóth Szabolcs

email: szabolcs.toth@vcc.live

phone: +36 1 999 7400

**VCC Live Group's Joint Data Protection Officer:**

name: dr. Seres Rita

email: rita.seres@vcc.live

phone: +36 1 999 7400

- (2) The objective of this Privacy Policy is to establish the scope of the processed personal data and the method of data processing, along with ensuring that the constitutional principles of data protection and the requirements of data security are adhered to in order to ensure respect for the privacy of natural persons.
- (3) To achieve the goals set out in subsection (2), your personal data will be handled confidentially, in line with the operational statutory provisions. We ensure their security and take the technical and organizational measures and create the procedural rules necessary to meet the pertinent statutory requirements and other recommendations.
- (4) When processing personal data, we adhere to the requirements of the operational data protection regulations, including individual industry regulations at all times. This especially pertains to the requirements of the regulation (EU) 2016/679 of the European Parliament and Council (General Data Protection Regulation, hereinafter: GDPR).

## 2. Consent-based Data Processing

You are entitled to withdraw your consent to processing your data anytime. The withdrawal of consent shall not affect the lawfulness of the data processing based on consent before its withdrawal.

You may revoke your consent in one of the following ways:

- in case of newsletter by clicking on the unsubscribe link in the newsletter or by sending a letter to [marketing@vcc.live](mailto:marketing@vcc.live)
- by sending a letter to [marketing@vcc.live](mailto:marketing@vcc.live)
- by post to the following address: VCC Live Group Zrt. 1112 Budapest, Balatoni út 2/A 5. emelet

## 3. Data Processing Activities

### 3.1 Newsletters

On our Portal, we offer the possibility to sign up to our newsletter. We only send you newsletters if you have given your explicit consent to receive them by ticking the corresponding box on the Portal.

If you opt in to our newsletter, we process the following data (**processed data**):

- a) When subscribing to our newsletter, you have to disclose the following data:
  - full name (optional)
  - email address
- b) If you subscribe to our newsletter services, in addition to the above, the following data will be stored/processed in connection with you:
  - the domain name you subscribed to our newsletter through
  - date and time of subscription
  - IP address

**Purpose of Data Processing:** To continuously inform you, as a user with a subscription to our newsletter, about the latest news and information with regards to our services and to prove the given consent.

You may unsubscribe from our newsletter at any time, without restriction or justification, free of charge as stated in section 2.

**Legal Basis for Data Processing:** Your prior, voluntary consent [GDPR Article 6. (1) a)]

**Term of Data Processing:** Until the withdrawal of your consent.

**Data Processor: Hubspot** - HubSpot Ireland Limited (address: 662880, Two Dockland Central, Guild Street Dublin 1, Ireland, <https://www.hubspot.com/>, privacy policy: <https://legal.hubspot.com/product-privacy-policy>). As part of the service provided by

Hubspot, personal data may be transferred to the USA. According to the relevant legislation, the transfer of data to this third country is adequately guaranteed by the fact that VCC Live has entered into standard contractual clauses with this service provider.

## **3.2 Applications for Job Adverts and Uploading CV-s under menu “Careers”**

On our Portal, you may apply for open positions under the menu “Careers”. You can apply by disclosing the following data and by uploading your CV:

- full name
- e-mail address
- telephone number
- short text message, which may contain personal data.

### **Processed data:**

- full name
- e-mail address
- telephone number
- short text message, which may contain personal data
- personal data in the CV
- IP address

**Purpose of data processing:** filling the advertised position, recruitment, employee selection, evaluation of applications; if consent to storing the application data is granted (registration to HR database), a further purpose shall be your information about job openings matching your qualifications, skills and intentions; and to prove the given consent.

### **Legal basis for data processing:**

- data processing is necessary in case of applying for the advertised job to take steps at the request of the applicant before concluding the employment contract [GDPR Article 6. (1) b)]
- Your prior and voluntary consent in case of registration to our HR database [GDPR Article 6. (1) a)]

### **Term of data processing:**

- If you are not selected for the position you applied for, or you decide to withdraw your application before the applications are evaluated, the purpose of data processing will cease to exist, and we delete your data and CV from our database.
- If, at the time when you are being informed about the results of your application, or at the time when you are withdrawing your application, or if you are registering to our HR database, give your express consent to retain your application for 24

months and to receive information about job openings that match your qualifications, we process your data and CV until you revoke your consent, but we will delete them from our database after the expiration of 24 months at the latest.

- If you are selected for the position, we will act in accordance with the rules of processing our employees' personal data, regarding which we will inform you when establishing employment relationship.

#### **Recipients of the data:**

- The HR leader, HR team members, the leader of the concerned department and the executive officer of the advertising company involved in the selection process to the extent and duration absolutely necessary to carry out their tasks.

**Data processor:** MiniCRM Zrt. (address: 1075 Budapest, Madách Imre út 13-14., <https://www.minicrm.hu/>, privacy policy: <https://www.minicrm.io/pp/>)

## **3.3 Contacting Us through the Portal**

3.3.1 On our Portal, you may initiate contact with us by disclosing certain data (**Contact us** and **Book a Demo** menu items). When filling out the contact form, we give you an opportunity to subscribe to our newsletter, as per point 3.1.

When contacting us, you have to disclose the following data:

- Name
- Telephone number
- Email address
- Number of operators
- Message

**Processed data:** name, telephone number, email address, personal data in the message, IP address

**Purpose of data processing:** establishing contact, and to prove the given consent

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6. (1) a)]

**Term of data processing:** Until the withdrawal of your consent. In order to ensure that the storage of personal data is limited to the necessary period of time, the controller shall delete the personal data even without withdrawal of consent after 3 years from the date on which they were provided.

In connection with your contacting, in addition to the above, the following data will be processed by us:

- The country, where you stayed at the time of contacting us
- The address of the URL-s of VCC Live Group you have previously visited (up to a 100 sites)

- If you signed up to our newsletter during contacting us, the fact of the subscription
- The URL address of the referrer site, where you were redirected to the website of VCC Live Group from.

**Purpose of data processing:** Preparation of a customized offer/cooperation

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6. (1) a]

**Term of data processing:** Until the withdrawal of your consent. In order to ensure that the storage of personal data is limited to the necessary period of time, the controller shall delete the personal data even without withdrawal of consent after 3 years from the date on which they were provided.

**Data processor:**

- **Pipedrive OÜ** (address: Paldiski mnt 80, Tallinn 10617, Estonia, <https://www.pipedrive.com/>, privacy policy: <https://www.pipedrive.com/en/privacy>)
- **Hubspot** - HubSpot Ireland Limited (address: 662880, Two Dockland Central, Guild Street Dublin 1, Ireland, <https://www.hubspot.com/>, privacy policy: <https://legal.hubspot.com/product-privacy-policy>). As part of the service provided by Hubspot, personal data may be transferred to the USA. According to the relevant legislation, the transfer of data to this third country is adequately guaranteed by the fact that VCC Live has entered into standard contractual clauses with this service provider.

3.3.2 On the Portal, we also provide you with the opportunity to initiate contact with us for partnership purposes by providing certain information (**Become a Partner** menu item).

When contacting us, you have to disclose the following data:

- Name
- Telephone number (optional)
- Email address
- Business sector
- Company name
- Message

**Processed data:** name, telephone number, email address, personal data in the message, IP address

**Purpose of data processing:** establishing contact, and to prove the given consent

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6. (1) a]

**Term of data processing:** Until the withdrawal of your consent. In order to ensure that the storage of personal data is limited to the necessary period of time, the controller shall delete the personal data even without withdrawal of consent after 3 years from the date on which they were provided.

## 3.4 Use of Chat Application

You may initiate communication with the customer service staff by using the button “Live Chat” on the Portal.

The purpose of chat communication is to maintain customer relations and may involve personal data.

**Processed data:** personal data entered during chat communication, IP address

**Purpose of data processing:** initiating contact; providing general information with regards to questions you asked from us; and to prove the given consent

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6. (1) a)]

**Term of data processing:** Until the withdrawal of your consent; in order to ensure that the storage of personal data is limited to the necessary period of time, the controller shall delete the personal data even without withdrawal of consent after 1 year from the date on which they were provided.

## 3.5 Cookies

We place an anonymous identification file (cookie) on your device, which in itself is not suitable to identify you in any way. It is only suitable to recognize your device. No names, e-mail addresses or any other personal information is necessary, as when the solution is applied, you are not disclosing us any personal data. The exchange of data only happens between the devices.

The aim of handling cookies is to find out more about your information use preferences, thus being able to improve our services. It also aims to facilitate displaying customized pages and marketing (advertisement) material to you based on your usage of the Portal.

You may block the placement of cookies on your device any time by adjusting your browser settings. At the same time, please note that blocking cookies will cause certain services to not work properly.

### What kind of cookies are we using?

The cookies used on our website fall into the following categories:

- A) Strictly Necessary
- B) Preference
- C) Statistics
- D) Marketing

A detailed description of the cookies used can be found in the [Cookie Policy](#).

We regularly review our website with a cookie scanning tool to make the cookie list as accurate as possible.

### **A) Strictly Necessary cookies**

There are cookies that are essential for the operation of the Portal. These are the so-called **technically necessary cookies**. **We may use these cookies without your permission. Data collection is anonymous.**

### **B) Preference cookies**

These cookies allow the website to remember information that changes the behavior or appearance of the website, such as used language or region. Cookies that help customize the user interface are used to store user preferences related to the service that are not associated with other persistent identifiers, such as username. (For example, cookies for the desired language, cookies for the desired display of results when querying.) We are entitled to use these cookies based on your consent.

### **C) Statistics cookies**

These cookies help the website owners to understand how visitors use the website by collecting and reporting information anonymously. Cookies used to increase performance collect information about how you use the Portal. We are entitled to use these cookies based on your consent.

We use **Google Analytics** cookies to better understand the behavior and characteristics of our users: which subpages, how often and for how long have they been visited by them. These cookies only identify your computer, the collection of data is anonymous. Details of Google Analytics (Google Ireland Limited, Gordon House, Barrow Street 4, Dublin, Ireland) data management practices can be found at this [link](#).

We use web analytics services provided by **Hotjar Ltd.** (level 2 St. Julians Business Center, 3, Elia Zammit Street, St. Julians STJ 1000 Malta). Web analytics services also use cookies to help analyze the use of online interfaces. Hotjar uses cookies and other technologies to collect information about user behaviour and devices. We use it to anonymously examine how well users are able to use the website. It allows us to develop our content so that it is easier and even more understandable for visitors to connect with our services. For more information on Hotjar's data management practices, the scope of the data processed and how to disable the cookie used by Hotjar, please visit Hotjar's [website](#).

We also use the lead identification service of **Albacross** (Albacross Nordic AB, Kungsgatan 26, 111 35 Stockholm, Sweden). The personal information collected through the use of cookies and used by Albacross is the IP address from which you visited the Portal and technical information that allows Albacross to separate different visitors from the same IP address. The purpose of data processing is to enable Albacross to improve its services on our website (lead generation) by adding the data collected to their database of company information. Another goal is to deliver targeted advertising to companies, and for this purpose data will be transferred to third party data service providers. You may find Albacross's privacy policy on this [link](#).



## D) Marketing

These cookies are used to track visitors across websites. Targeted cookies allow you to display ads that are relevant and interesting to a particular visitor. In addition, these cookies allow you to connect to social media sites. Only your computer is identified, the data collection is anonymous. We are entitled to use these cookies based on your consent.

**Remarketing** allows us to display ads to people who have previously visited our website. The purpose of data processing is to display advertisements to previous users on Facebook and Google.

The legal basis for data processing is the legitimate interest of VCC Live (direct marketing) based on Article 6 (1) f) of the GDPR. Data subject has the right to object at any time to the processing of personal data for remarketing purposes concerning him or her.

We use remarketing services, for example, the remarketing services of **Google Ads** to have our customized advertisements reach you. You may block these cookies in the control panel of your Google advertisement settings, as per the instructions thereof. For Google's data protection policy with regards to advertisements, [click here](#).

We also use the lead identification service of **Albacross** (Albacross Nordic AB, Kungsgatan 26, 111 35 Stockholm, Sweden). The personal information collected through the use of cookies and used by Albacross is the IP address from which you visited the Portal and technical information that allows Albacross to separate different visitors from the same IP address. The purpose of data processing is to enable Albacross to improve its services on our website (lead generation) by adding the data collected to their database of company information. Another goal is to deliver targeted advertising to companies, and for this purpose data will be transferred to third party data service providers. You may find Albacross's privacy policy on this [link](#).

## 3.6 Use of Social Media Add-Ons (Facebook, Twitter, LinkedIn, Instagram)

On our Portal, these add-ons are blocked by default. The add-ons are only allowed if you click on the respective button. By allowing the add-ons, you will create a connection with the social media platform and you authorize disclosure of your data to the platforms Facebook/Twitter/LinkedIn/Instagram (Facebook).

If you are logged in to your Facebook/Twitter/LinkedIn/Instagram account, the given social media platform may link your visit to your account.

By clicking the corresponding button, your browser will transfer the pertinent information directly to the given social media platform and store it there.

- **Twitter's** server will record data about your activity on the Portal and links these data with your Twitter account. Upon using the button "re-tweet", these data will be available for Twitter users and/or published.
- When you are browsing on the Portal, through the integrating modules you build a direct datalink between your browser and **Facebook's** server. Through this, Facebook receives the information that somebody from your IP address visited this Portal. If you are using these integrating modules (for example by clicking Like or Share, Comment, etc.) while you are logged in to your Facebook account, the relevant contents of the Portal will be linked to your Facebook profile. In such cases, Facebook will link your activities on the Portal to your Facebook account. The above also applies to **Instagram**.
- **LinkedIn's** server will record data about your activity on the Portal and links these data with your LinkedIn account. Upon using the LinkedIn button Share, these data will be available for LinkedIn users and/or published.

Further information with regards to the scope and purpose of data collection, further processing of your data by Facebook/Twitter/LinkedIn/Instagram, your rights to the protection of your personal data are available in the privacy statement of Facebook/Twitter/LinkedIn/Instagram:

<https://www.facebook.com/policy.php>

<https://twitter.com/privacy>

<https://www.linkedin.com/legal/privacy-policy>

<https://help.instagram.com/519522125107875>

### 3.7 Log Files

To allow the use of the services and technical operation of the Portal, along with statistical purposes, the system automatically logs the following data:

- dynamic or static IP address of your device
- depending on your device settings, the type of your browser and operating system
- your activities associated with the website
- date and time of the activity

**Term of data processing:** 90 days from recording the data

**Purpose of data processing:** On one hand, the use of these data serves technical purposes, such as analysis and a subsequent examination of secure operation of servers. On the other hand, these data are used for creating visitor statistics and to analyze user preferences to improve our services.

**Legal basis of data processing:** the service provider's legitimate interest [GDPR Article 6. (1) f)]

The above data are not suitable to identify you and they are not linked to other personal data.

Any personal data associated with you may be processed by us for purposes other than the purposes specified above – especially to improve the efficiency of services or for market research – provided that we have specified the purpose of data processing in advance and have your consent.

These data may not be linked to your identification information and may not be disclosed to third parties without your consent.

Prior to using the Portal and during that, we allow you to familiarize with the types of data processed by us and the purposes of such data processing, including processing of data not directly linked to you.

### **3.8 E-Book**

VCC Live publishes usable content from time to time in the form of an e-book, which is available to everyone and can be downloaded for free from VCC Live's website.

**Processed data:** first name, last name, email address

**Purpose of data processing:** making the e-book available, and to prove the given consent

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6 (1) a)].

**Term of data processing:** until the withdrawal of your consent, but 10 working days at most

### **3.9 Webinar**

VCC Live publishes usable content on its website from time to time in the form of webinars (both live and on-demand), which are available to all and free of charge.

**Processed data:** first name, last name, email address

**Purpose of data processing:** making the webinar available

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6 (1) a)].

**Term of data processing:** until the withdrawal of your consent, but 1 year at the latest

## 3.10. LinkedIn Lead Gen Forms

### 3.10.1. Usable contents

VCC Live publishes usable contents (e.g. in the form of an e-book, video, etc.) which is available to all LinkedIn members free of charge by filling in the LinkedIn Lead Gen Forms web form.

**Processed data:** first name, last name, email address

**Purpose of data processing:** making the contents available and to prove the given consent

**Legal basis for data processing:** Your prior, voluntary consent [GDPR Article 6 (1) a)].

**Term of data processing:** until the withdrawal of your consent, but for a maximum of 10 working days.

Information about your rights and settings for the protection of your personal data can be found in LinkedIn's privacy statement, which is available at the following link: [link](#), [link](#).

### 3.10.2. Newsletters

By filling in the LinkedIn Lead Gen Forms web form, you will be given the opportunity to subscribe to the VCC Live newsletter. We will only send you a newsletter if you give us your explicit consent to send you a newsletter by ticking the box on the form.

**Processed data:** first name, last name, email address

**Purpose of Data Processing:** To continuously inform you, as a user with a subscription to our newsletter, about the latest news and information with regards to our services and to prove the given consent.

You may unsubscribe from our newsletter at any time, without restriction or justification, free of charge as stated in section 2 of this Privacy Policy.

**Legal Basis for Data Processing:** Your prior, voluntary consent [GDPR Article 6. (1) a)]

**Term of Data Processing:** Until the withdrawal of your consent.

Information about your rights and settings for the protection of your personal data can be found in LinkedIn's privacy statement, which is available at the following link: [link](#), [link](#).

### 3.10.3. Contacting for direct marketing purposes

**Processed data:** first name, last name, email address

**Purpose of Data Processing:** Contacting for direct marketing purposes

**Legal basis of data processing:** the service provider's legitimate interest [GDPR Article 6. (1) f)]

The balancing test, which can be requested at [legal@vcc.live](mailto:legal@vcc.live), includes a demonstration that we have adequately identified our legitimate interests and, on this basis, we will carry out the processing in a way that does not constitute a disproportionate restriction on your interests, rights and freedoms.

**Term of Data Processing:** 1 year from the date of acquisition of the data.

You have the right to object to the processing of your personal data for direct marketing purposes, whether with regard to initial or further processing, at any time and free of charge, under the conditions set in section 6.4 of this Privacy Policy.

**Data Processor: Hubspot** - HubSpot Ireland Limited (address: 662880, Two Dockland Central, Guild Street Dublin 1, Ireland, <https://www.hubspot.com/>),

Information about the further processing and use of your data by LinkedIn, your rights and settings for the protection of your personal data can be found in LinkedIn's privacy statement, which is available at the following [link](#).

As part of the service provided by Hubspot, personal data may be transferred to the USA. According to the relevant legislation, the transfer of data to this third country is adequately guaranteed by the fact that VCC Live has entered into standard contractual clauses with this service provider.

## 4. Information and Contact Details of Data Processors

Information on data processors used by us is available in point 3.

During our data processing activities, in addition to what's established in point 3, we use the following data processors:

- Data of the server service provider: Vultr Holdings Corporation (319 Clematis Street Suite 900, West Palm Beach, FL 33401, USA)

We reserve the right to use further data processors other than the ones listed above, provided that we publish such data processors' names and addresses until, but the latest at the time of the start of data processing.

## 5. Contacting for direct marketing purposes

### 5.1 Contacting the visitor of the Portal

**Purpose of data processing:** contacting for direct marketing purposes

**Legal basis of data processing:** GDPR Article 6. (1) f) [the processing is necessary for the legitimate interest of VCC Live]

**Processed data:** name, email address, telephone number, number of employees, number of agents, job title, country

**Source of processed data:** personal data provided by the data subject on the Portal (Contact, Book Demo, E-Book, Webinar, subscribing to newsletter)

**Term of data processing:** 1 year from the date of acquisition of the data.

**Data processor: Hubspot** - HubSpot Ireland Limited (address: 662880, Two Dockland Central, Guild Street Dublin 1, Ireland, <https://www.hubspot.com/>),

As part of the service provided by Hubspot, personal data may be transferred to the USA. According to the relevant legislation, the transfer of data to this third country is adequately guaranteed by the fact that VCC Live has entered into standard contractual clauses with this service provider.

### **Interest balance test**

The balancing test, which can be requested at [legal@vcc.live](mailto:legal@vcc.live), includes a demonstration that we have adequately identified our legitimate interests and, on this basis, we will carry out the processing in a way that does not constitute a disproportionate restriction on your interests, rights and freedoms.

The data subject has the right to object to this processing based on legitimate interest, as set out in point 7.4 of present Privacy Policy.

### **Profiling**

*Definition:* Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

VCC Live has a legitimate interest in profiling in order to provide you with offers tailored to your needs and interests. Personalised offers are sent to the data subject by email.

If the data subject has consented to the use of marketing cookies on our website and initiates a contact with us by providing personal data (Contact, Book Demo, E-book, Webinar, newsletter subscription), we will assign points to the data subject's activities on our website through the software of our data processor, as part of profiling, which will allow us to easily determine the quality of the data subject's potential subscribers. If, as a result of the profiling, we conclude that the data subject is a potential subscriber, we will contact the data subject via email.

We have carried out a data protection impact assessment in connection with the profiling, which concluded, among other things, that the severity and likelihood of potential risks (e.g. unauthorised access to data, loss of data) are negligible. Measures are in place to ensure that the data subject's data are kept secure.

The provision of personal data by the data subject is not mandatory, but is necessary to initiate the contact (Contact, Book Demo, E-book, Webinar, newsletter subscription), in case of failure to provide the data, the contact cannot be established.

The data subject has the right to object at any time, free of charge, to the processing of personal data concerning him or her for the above purposes.

## **6. Persons with right to access personal data**

Our own employees, agents, and other contributors who need to have access to such data to fulfill their professional duties or the tasks assigned to them. We shall ensure that individuals who have access to the data processed by us adhere to the provisions of this privacy policy and to the requirements of the applicable legislation at all times.

## **7. Your Rights with regards to Data Processing**

The service provider will inform you without undue delay, but in any case within one month of receipt of the request about the actions taken concerning the request about the rights of the data subject. If necessary, taking into account the complexity and number of requests, the deadline may be extended by two further months.

The service provider provides you the actions taken in connection with data subject rights free of charge, however where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the service provider may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.

### **7.1 Right to Access**

(1) You are entitled to receive feedback from us whether processing of your personal data is in progress, and if this is the case, you are entitled to access to your personal data and the following information:

- a) purpose of data processing;
- b) data categories of the affected personal data
- c) recipients your personal data are or will be disclosed to, especially recipients in third countries or international organizations
- d) the term of retaining data, or if not possible, the factors of establishment of this term
- e) your right to request corrections, deletion or restriction of processing of your personal data and your right to object against processing of such personal data;
- f) the right to submit a complaint to a supervisory authority;

g) if your personal data have not been obtained from you, all available information with regards to their sources

(2) The copy of the personal data forming the subject of data processing shall be disclosed to you. For further copies requested by you, we charge a reasonable fee, based on our administrative costs. If the request was submitted electronically, we disclose the information in a widely used electronic format, except requested otherwise.

## **7.2 Right to Erasure ('right to be forgotten')**

(1) You shall have the right to obtain from the service provider the erasure of personal data concerning you without undue delay and the service provider shall have the obligation to erase 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 they were collected or otherwise processed,
- b) you withdraw your consent on which the processing is based and there is no other legal ground for processing
- c) you object to the processing pursuant to GDPR Article 21. (1) and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to GDPR 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 European Union or Member State law to which the service provider is subject.

## **7.3 Right to Rectification**

(1) Upon your request, we correct your personal data without undue delay.

(2) If accurate and correct or supplementary data is not available, we base our correction/supplement on your supplementary statement.

## **7.4 Right to Object**

(1) You may object anytime against processing your personal data on grounds relating to your particular situation, if

- a) processing or transmission of personal data is necessary to protect our or third parties' legitimate interests only, except where data processing is mandatory;
- b) your personal data are used or transmitted for direct marketing purposes;  
or
- c) in any other cases defined by law.



- (2) We examine your objection and suspend data processing without delay, but within 15 days from submission of the request at the latest, and we inform you about the results in writing.

If the objection is justified, we shall cease processing your data, including further data collection and data transmission, and block such data. We also shall inform all parties the respective personal data were transmitted to earlier about the objection and the measures taken. These entities shall take action to enforce the right to objection.

If you do not agree with our decision, or, if we fail to fulfill the above obligations within the 15 days deadline, you may submit your redress request to the competent court within 30 days from receipt of the decision or from the last day of the above deadline.

## 7.5 Right to Restriction of Data Processing

- (1) We will restrict data processing, if one of the following circumstances exist:

- a) You challenge the accuracy of the personal data;
- b) Data processing is unlawful, and you object to the deletion of your data, instead, you request the restriction of processing thereof;
- c) We no longer need your personal data for data processing, but you request those for submission, representation or protection of your legal claims, or
- d) You have objected to data processing

- (2) Except for storage, if data processing falls under restrictions, the affected personal data may only be processed with your consent, for submission, representation or protection of legal claims or to protect the rights of third parties (natural persons or legal entities), or if in the interest of the European Union or any member state.

## 7.6 Right to Data Portability

You shall have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format - if this is technically feasible -, and have the right to transmit those data to another controller without hindrance from us, if data processing is based on your **consent** or a respective **agreement**, and processing is carried out by **automated means**.

You shall also have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Your rights under this point 7 may be restricted to safeguard the State's internal or external security, including purposes of home defence, public security, crime prevention and -prosecution, law enforcement, to protect the economic- or financial interests of the State, to prevent and investigate disciplinary- and ethical offenses committed on the job or omission of employment law- and health and safety obligations – always including oversight and supervision –, and to protect your or third party rights.

## 8. Legal Redress

If you experience an infringement of your rights, you may request remedy from:

- a) the competent supervisory authority in the member state
  - Contact details of supervisory authorities of the member states are available here:  
[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)
- b) the competent court with jurisdiction over your place of residence or temporary address.