# PRIVACY POLICY

v3.3
(effective as of 2026.10.20)

## 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 domain vcc.live, 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: 1117 Budapest, Október huszonharmadika street 8-10., Allee Corner Office Building, Bercsényi Tower 4th floor
Company register number: 01-10-141046
Mailing address: 1117 Budapest, Október huszonharmadika street 8-10., Allee Corner Office Building, Bercsényi Tower 4th floor
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: 1117 Budapest, Október huszonharmadika street 8-10., Allee Corner Office Building, Bercsényi Tower 4th floor
Company register number: 01-09-735941
Mailing address: 1117 Budapest, Október huszonharmadika street 8-10., Allee Corner Office Building, Bercsényi Tower 4th floor
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:** 1117 Budapest, Október huszonharmadika street 8-10., Allee Corner Office Building, Bercsényi Tower 4th floor

**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: legal@vcc.live
phone: +36 1 999 7400

(2) The objective of this Privacy Policyt 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
- by sending a letter to marketing@vcc.live
- by post to the following address: VCC Live Group Zrt. 1117 Budapest, Október huszonharmadika street 8-10., Allee Corner Office Building, Bercsényi Tower 4th floor

# 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. This transfer of personal data to a third country is lawful pursuant to Article 45 of the GDPR, as HubSpot is certified and listed as an active participant under the EU-U.S. Data Privacy Framework adopted by the European Commission.

## 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:** Evolution Consulting Kft. (HRMaster, address: 3505 Miskolc, Egyetemváros AFKI. ép. 2. em., https://www.evolution-consulting.hu/adatkezeles/)

## 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
- 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 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:** 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. This transfer of personal data to a third country is lawful pursuant to Article 45 of the GDPR, as HubSpot is certified and listed as an active participant under the EU-U.S. Data Privacy Framework adopted by the European Commission.

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.

## 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;

**Data processor**: Captiwate Inc. (548 Market St PMB 34444, San Francisco, CA 94104, United States)

## 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 regulary 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 persistant identifiers, such as username. (For example, cookies for the desired language, cookies 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.

### 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.

## 3.6 Links to social media platforms

The Portal contains links to the Data Controller's social media pages (Facebook, Instagram, LinkedIn, X). By clicking on these links, you will be redirected to the Data Controller's page on the respective social media platform.

The display of these links does not, in itself, result in the transfer of your personal data to the operators of the social media platforms.

When you access a social media platform, the platform operator may process your personal data, including, in particular, your IP address, technical information about your browser and device, and, if you are logged into the platform, data associated with your user account.

Further information on the processing of personal data by social media platforms, including the purposes and legal bases of such processing and the options available for exercising your data subject rights, can be found in the privacy notice of the respective platfor:

Facebook and Instagram: https://www.facebook.com/privacy/policy/

LinkedIn: https://www.linkedin.com/legal/privacy-policy

X (previously Twitter): https://x.com/en/privacy

## 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

## 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 addres

**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

## 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

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, phone number

**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)]

**Term of Data Processing:** Until successful objection

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. This transfer of personal data to a third country is lawful pursuant to Article 45 of the GDPR, as HubSpot is certified and listed as an active participant under the EU-U.S. Data Privacy Framework adopted by the European Commission.

**Legitimate Interest Assessment (LIA)**

Identification of the legitimate interest: contacting prospective customers

Categories of personal data concerned by the processing: name, email address, telephone number

Demonstration of the legitimacy of the interest: The processing of the personal data specified in Section 3.10.3 of the VCC Live Online Privacy Notice is strictly necessary for sending offers to prospective customers. The processing of personal data serves VCC Live's legitimate business interests and, at the same time, the interests of prospective customers, as such contact enables them to obtain more comprehensive information about the services provided by VCC Live.

Demonstration of the necessity and proportionality of the interest: The processing of the personal data referred to above is strictly necessary for sending offers and thereby attracting the attention of prospective customers, is suitable for achieving this purpose, and is proportionate to that purpose. Sending messages by email and contacting prospective customers by telephone can only be carried out through the processing of the personal data specified above.

Outcome of the Legitimate Interest Assessment: Based on the assessment carried out in accordance with the above considerations, it can be established that the restriction of the data subject's personal data is necessary and proportionate. The processing of personal data in this manner is purpose-specific and complies with the principle of data minimisation.

The data subject has the right to object to the processing based on the present legitimate interest in accordance with Section 7.4 of the Online Privacy Notice.

# 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 data subjects who initiate contact through the VCC Live website (Portal) for direct marketing purposes

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

**Categories of data subjects:**

- natural persons or businesses interested in VCC Live products
- employees of businesses who are natural persons

**Processed data**: name, email address, telephone number,

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

**Term of data processing**: Until successful objection

**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. This transfer of personal data to a third country is lawful pursuant to Article 45 of the GDPR, as HubSpot is certified and listed as an active participant under the EU-U.S. Data Privacy Framework adopted by the European Commission.

**Legitimate Interest Assessment (LIA)**

Identification of the legitimate interest: contacting prospective customers

Categories of personal data concerned by the processing: name, email address, telephone number

Demonstration of the legitimacy of the interest: The processing of the personal data specified in Section 5.1 of the VCC Live Online Privacy Notice is strictly necessary for sending offers to prospective customers. The processing of personal data serves VCC Live's legitimate business interests and, at the same time, the interests of prospective customers, as such contact enables them to obtain more comprehensive information about the services provided by VCC Live.

Demonstration of the necessity and proportionality of the interest: The processing of the personal data referred to above is strictly necessary for sending offers and thereby attracting the attention of prospective customers, is suitable for achieving this purpose, and is proportionate to that purpose. Sending messages by email and contacting prospective customers by telephone can only be carried out through the processing of the personal data specified above.

Outcome of the Legitimate Interest Assessment: Based on the assessment carried out in accordance with the above considerations, it can be established that the restriction of the data subject's personal data is necessary and proportionate. The processing of personal data in this manner is purpose-specific and complies with the principle of data minimisation.

The data subject has the right to object to the processing based on the present legitimate interest in accordance with Section 7.4 of the Online Privacy Notice.

# 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://www.edpb.europa.eu/about-edpb/our-members_en
b) the competent court with jurisdiction over your place of residence or temporary address.