

## **PRIVACY POLICY**

Ad Valorem Hungary as data controller (registered office: 1112 Budapest, Nevegy utca 16. TT. 4; company registration number: 01-09-994842, tax number: 24191144-2-43; "Data Controller"), subject to the provisions of Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "General Data Protection Regulation"), hereby informs Data Subjects about the processing of their personal data.

### **Company name and contact details of the data controller:**

Ad Valorem Hungary (registered office: 1112 Budapest, Nevegy utca 16. TT. 4; company registration number: 01-09-994842, tax number: 24191144-2-43;)

### **The scope of the personal data processed, the legal basis for the processing, the purpose and duration of the processing:**

<b>Scope of personal data processed</b>	<b>Legal basis for processing</b>	<b>Purpose of processing</b>	<b>Duration of processing</b>
Name, e-mail address, telephone number, position of the natural person	User's consent pursuant to Article 6(1)(a) of the GDPR	Information on and participation in events organised by the Data Controller.	In case of withdrawal of consent, all personal data provided will be deleted.
Name, e-mail address, telephone number, position of the natural person	User's consent pursuant to Article 6(1)(a) of the GDPR	For contact purposes	In case of withdrawal of consent, all personal data provided will be deleted.
Name, e-mail address, telephone number, position of the natural person	User's consent pursuant to Article 6(1)(a) of the GDPR	Processing for statistical purposes	In case of withdrawal of consent, all personal data provided will be deleted.
Name, e-mail address, telephone number, position of the natural person	User's consent pursuant to Article 6(1)(a) of the GDPR	Marketing enquiries and sending electronic newsletters	In case of withdrawal of consent, all personal data provided will be deleted.

[*In case of processing based on consent (Article 6(1)(a) or Article 9(1)(a) GDPR). The withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal.*]

### **Transfer of personal data, recipients of personal data and categories of recipients**

Personal data will not be transferred to a third country, that is, outside of the European Union, or to international organisations.

### **Data subject's rights in relation to data processing:**

The Data Subject may request the Data Controller to

- access his or her personal data
- obtain access to his or her personal data, and
- erase or restrict the processing of his or her personal data, except for mandatory processing.

#### **Right to access:**

The Data Subject has the right to obtain feedback from the controller on whether or not his or her personal data are being processed and, if such processing is ongoing, then he or she has the right to access the personal data. Where such processing is ongoing, the Data Controller shall provide the Data Subject with a copy of the personal data that are the subject of the processing. For additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the Data Subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

#### **Right to rectification:**

The Data Subject has the right to ask for the correction of inaccurate personal data relating to him or her by the Controller without delay.

#### **Right to erasure:**

The Data Subject shall have the right to ask for the erasure of personal data relating to him or her by the Data Controller without undue delay, and the Data Controller shall be obliged to erase personal data relating to the Data Subject without delay if one of the following applies:

- the personal data are no longer necessary for the purposes for which they were collected or are otherwise processed;
- the Data Subject withdraws the consent on the basis of which the processing was carried out in accordance with Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation and there is no other legal basis for the processing;
- the Data Subject objects to the processing on the basis of Article 21(1) of the General Data Protection Regulation and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing on the basis of Article 21(2) of the General Data Protection Regulation;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- the personal data have been collected in connection with the provision of information society services referred to in Article 8(1) of the General Data Protection Regulation (conditions for the consent of the child).

#### **Right to restriction of processing:**

The Data Subject has the right to request the restriction of processing by the Controller if one of the following conditions is met:

- the Data Subject contests the accuracy of the personal data, in which case the restriction shall apply for a period of time which allows the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of their use;

- the Data Controller no longer needs the personal data for the purposes of the processing but the Data Subject requires them for the establishment, exercise or defence of legal claims;
- or the data subject has objected to the processing in accordance with Article 21(1) of the General Data Protection Regulation, in which case the restriction shall apply for a period of time until it is established whether the legitimate grounds of the Data Controller override those of the data subject.

Where processing is subject to restriction, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

### **Right to data portability:**

The Data Subject also has the right to receive the personal data that he or she has provided to the Data Controller in a structured, commonly used, machine-readable format and the right to transmit those data to another Data Controller without hindrance from the Data Controller to whom the personal data have been provided, if. (i) the processing is based on consent within the meaning of Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract within the meaning of Article 6(1)(b) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

### **Right to object:**

On grounds relating to his or her particular situation, the Data Subject has the right to object at any time to the processing of his or her personal data based on Article 6(1)(e) or (f), including profiling based on those provisions. In such a case, the Data Controller may no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

### **General rules on the exercise of data subjects' rights:**

The Data Controller shall inform the Data Subject of the action taken in response to his or her request without delay, but no later than one month from the receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform the Data Subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the Data Subject requests otherwise.

The Data Controller shall provide the information and take action free of charge to the Data Subject. Where the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Data Controller shall, taking into account the

administrative costs of providing the information or information or of taking the action requested:

- charge a reasonable fee, or
- refuse to act on the request.

The burden of proving that the request is manifestly unfounded or excessive shall lie with the Data Controller. Where the Data Controller has reasonable doubts as to the identity of the natural person making the request, it may request additional information necessary to confirm the identity of the Data Subject.

#### **Remedies:**

The Data Subject may at any time contact the Data Controller (address: 1112 Budapest, Nevegy u. 16; phone: +36 30 343 4178; email: [info@advalorem.hu](mailto:info@advalorem.hu)) regarding the processing of his or her personal data.

The Data Subject may also contact the National Authority for Data Protection and Freedom of Information (Dr. Attila Péterfalvi, President of the National Authority for Data Protection and Freedom of Information, postal address: 1363 Budapest, PO Box 9, address: 1055 Budapest, Falk Miksa Street 9-11, phone: +36 (1) 391-1400; fax: +36 (1) 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

#### **Possibility to modify this privacy notice:**

The Data Controller reserves the right to unilaterally amend this Privacy Notice by prior notice to the Data Subjects. The Data Subject shall have the right to notify the Data Controller of the amended Privacy Notice without prior notice.