



DATA PROTECTION AND DATA PROCESSING NOTICE



iCONTEST Kft.
BUDAPEST

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1 INTRODUCTION OF THE CONTROLLER

iCONTEST Kft. (hereinafter referred to as "Controller", "Company" or "we") has created the following data protection notice to ensure the lawfulness of its internal data processing processes and the rights of data subjects.

Name of Controller **iCONTEST Informatikai és Tanácsadó Korlátolt Felelősségű Társaság**

Controller

company registry number 01 09 916742

Controller's registered office 1037 Budapest, Bokor u. 15-21.

Controller's electronic

address info@icontest.hu ; adatvedelmiincidens@icontest.hu

Controller's representative Péter Dobozi, managing director

Data Protection Officer Márk Erdei, managing director

The Controller processes personal data in accordance with all applicable laws, in particular, the following:

- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter, the "Info Act");
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation) (hereinafter, the "Regulation" or "GDPR").

The Controller shall process personal data confidentially and take all necessary technical and organizational measures to ensure the confidentiality of the data, including IT, information security and other technical and organizational measures to ensure secure data processing.

Terms

The terminology used in this notice is identical to the interpretative definitions set out in Article 4 of the Regulation and, supplemented at certain points, to the interpretative provisions of Section 4 of the Info Act. 3.

When this notice refers to data or processing, it means personal data or the processing thereof.

2 CHARACTERISTICS OF EACH PROCESSING PURPOSE

2.1 COMMUNICATION-RELATED DATA PROCESSING

In today's fast-paced world, the Controller primarily communicates with partners and customers electronically, but anyone can also contact the Controller by letter with questions. Anyone can contact the Controller directly by e-mail or postal mail, whether to information request, questions of a technical nature, requests for proposals or any other matter.

In the course of communication with the data subject in relation to any matter, the Controller will process e-mails and letters as described in this notice.

Purpose of processing

Communication, responding to inquiries from interested parties. The data provided by the data subject is processed by the Controller solely for the purposes of communication with the data subject and for the administration of the message.

The Controller will only contact any data subject in connection with the performance of a contract already in force or on other legitimate grounds, in compliance with the rules on data protection.

Personal data processed

Name, e-mail address, postal address in the case of postal mail, and any other information which the data subject considers relevant to the matter in question. Data subjects have the possibility to voluntarily provide his or her telephone number if he or she wishes to be contacted directly by the Controller by telephone.

Legal basis for processing

The legal basis for the processing of personal data is Article 6(1)(b) of the Regulation, i.e., processing is necessary for the performance of a contract (obligation) or to take steps at the request of the data subject prior to entering into a contract to which the data subject is a party. The Controller considers that communication with the data subjects is preliminary processing in relation to a contract (agreement) to be concluded at a later stage or processing in relation to a contract already concluded.

In addition, Article 6(1)(f) of the Regulation (legitimate interest) also provides a legal basis for the Controller to process the data. It is in the legitimate interest of the Data Controller to process personal data necessary to respond to a request for information.

Source of personal data

Data subject. As the data subject is the source of the personal data, the Controller will inform him/her directly of any changes to the scope of the data processed when they are collected.

Recipients of personal data provided

Personal data may be processed by the employees of the Controller who have the right to make suggestions or decisions in relation to the message sent by the data subject or the management of the case required on the basis of the message.

Processor(s):

For processing, the Controller uses the following processors: Google LLC - the e-mail service provider and hosting provider (Gmail, Drive) of the Controller. The processors have undertaken confidentiality obligations and contractual guarantees regarding the retention of personal data obtained in the course of their duties.

Transfer of personal data to a third country or international organization

Personal data will not be transferred directly by the Controller to any third country or international organization, however, personal data may be transferred by Google LLC as a processor to the United States or any other country in which Google LLC or its sub-processors operate.

Data is transferred by Google LLC in accordance with Chapter V of the Regulation, using model contracts defined by the competent body of the European Union, subject to additional technical and organizational measures. Google LLC provides detailed information about the data transfer and the technical and organizational measures used in the "Privacy Supplements" document. Google LLC's privacy policy, which covers all of its subsidiaries, is available here:

<https://policies.google.com/privacy?hl=hu>.

Duration of the processing of personal data

If a contract (obligation) of any kind is concluded between the Controller and the data subject, the Controller will process the personal data obtained in the course of the communication in relation to the contract concerned, until the expiry of the limitation period at the latest.

If no contract or agreement is concluded between the Controller and the data subject following the pre-contractual processing or if the communication is not related to a contract and the communication cannot have any future legal effect, the Controller will process the personal data obtained during the communication until the communication is finally closed.

Automated decision-making and profiling

Neither of these occurs during the processing.

Provision of personal data

The processing of personal data is a condition for replying to the message and, thus, for the communication between the data subject and the Controller.

2.2 ISSUING AND KEEPING INVOICES

Purpose of processing

The purpose of processing by the Controller is the issue and storage of invoices in accordance with Section 159 (1) and Section 169 of Act CXXVII of 2007 on Value Added Tax (VAT Act) and Section 169(2) of Act C of 2000 on Accounting (Accounting Act).

- in Sections 159(1) and 169 of Act CXXVII of 2007 on Value Added Tax („VAT Act”), and
- in accordance with Section 169(2) of Act C of 2000 on Accounting („Accounting Act”).

Personal data processed

The Controller's customers are generally legal persons, but may also be natural persons and sole proprietors, in which case the following data are considered personal data and processed on the following basis.

Data specified in Section 169 of the VAT Act, and at least:

- a) name,
- b) billing address,
- c) tax number.

Legal basis for processing

The legal basis for processing when issuing invoices is paragraph c) of Article 6(1) of the Regulation, i.e., the fulfillment of a legal obligation.

Source of personal data

Data subject. As the data subject is the source of the personal data, the Controller will inform him/her directly of any changes to the scope of the data processed when they are collected.

Recipients of personal data provided

The personal data are processed by the employees of the Controller who are responsible for the administration of invoicing.

The auditor of the Company, Audit Doktor Könyvvizsgáló és Tanácsadó Kft. (address: 2000 Szentendre, Pannónia utca 24/a.) may have access to the data related to the invoices in the course of its duties, acting as an independent controller.

Transfer of personal data to a third country or international organization

The Controller will not transfer the above personal data of the data subject to third countries or international organizations.

Duration of the processing of personal data

The Controller processed the personal data of the data subject for at least 8 years from the date of issue in accordance with Section 169(2) of the Accounting Act.

Automated decision-making and profiling

Neither of these occurs during the processing.

Provision of personal data

The processing of all is based on law and is mandatory.

2.3 PROCESSING OF DATA RELATING TO THE PERFORMANCE OF CONTRACTS AND CONTACT DETAILS

The Controller enters into contracts with other legal subjects, which may be individuals or legal entities, in order to use or provide the service.

In the case where the Controller enters into a contract with a natural person, the Controller processes the personal data necessary to identify and contact that person and other personal data relating to the performance of the contract.

If the Controller enters into a contract with a legal person, the processing of the data of the contact person of the partner is necessary to communicate with each other during the cooperation and in order to maintain and deepen the cooperation.

Purpose of processing

The purpose of processing is the conclusion and performance of the contract concluded by the Controller and the contracting partner, including communication in connection with the contract, and the establishment and maintenance of a business relationship.

Personal data processed

Given that the source of personal data in the case of a contract with a natural person is the data subject, the Controller will provide final information on the exact scope of the personal data processed at the time of the conclusion of the contract. In general, the following data are processed in the case of a natural person contracting party:

- a) name, (identification)
- b) mother's name, (identification)

- c) place and date of birth (identification)
- d) home address, (contact)
- e) in the case of sole proprietors, the registered office, (contact)
- f) telephone number, (contact)
- g) e-mail, (contact)
- h) in the case of payment by bank transfer: bank account number, account managing bank,
- i) if the fee is paid after the deduction of public charges, processing the social security number is necessary,
- j) in the case of an onerous contract, the tax identification number or, for sole proprietors, the tax number,
- k) in the case of a sole proprietor, a registration number,
- l) other data strictly necessary for the performance of the contract.

In the case of a legal person, the name of the representative and the name, telephone number, e-mail address and position of the contact person are processed by the Controller.

Legal basis for processing

Natural person: Paragraph (b) of Article 6(1) of the Regulation: performance of a contract.

Where the contact person does not have a direct contractual relationship with the Controller, i.e., the data subject is an employee or other agent of the contracting partner, the legal basis for processing is the legitimate interest of the Controller pursuant paragraph (f) of Article 6(1) of the Regulation.

It is in the legitimate interest of the Controller to establish and maintain a business relationship with the company represented by the data subject, in order to perform the contract as efficiently as possible. The contacts are therefore necessary to establish economic cooperation and to fulfill the contract(s) between the organizations. The Controller will not process the personal data of the data subject for any other purposes without a legal basis.

Source of personal data

Where the Controller contracts with a natural person, the source of the personal data is the data subject. In such a case, the Controller will inform the data subject directly of any changes to the scope of the data processed when they are recorded.

In the case of a contract with a legal person, the source of the contact details is the contracting party.

Recipients of personal data provide

The Controller makes the personal data of the data subject available only to its employees who are involved in the performance of the legal relationship.

Transfer of personal data to a third country or international organization

The Controller will not transfer the above personal data of the data subject to third countries or international organizations. Duration of the processing of personal data: The Controller processes the personal data of the data subjects until the expiry of the general limitation period specified in the Civil Code following the performance of the contract, provided, that the contract, if it constitutes an accounting document directly and indirectly supporting the accounting, must be kept by the Controller for at least 8 years in a legible form, retrievable by reference to accounting records, in accordance with Section 169(2) of Act C of 2000 on Accounting.

The Controller stops processing the contact details for communication purposes set out in this notice if it is informed that the contact has ceased to be employed by the contracting partner.

Automated decision-making and profiling

Neither of these occurs during the processing.

Provision of personal data

The provision of personal data is mandatory for the conclusion and performance of the contract.

2.4 CONDUCTING THE RECRUITMENT PROCEDURE, ASSESSING JOB APPLICATIONS

Purpose of processing

To carry out the selection process necessary to fill the advertised vacancy and, during the selection process, to come to know the professional and human qualities, educational qualifications and previous work experience of the candidates in order for the Controller to find the most suitable person to fill the vacant position.

Personal data processed

Data provided by the data subject in the CV, possibly in a cover letter. If the data subject sends additional personal data to the Controller, it will also be processed in accordance with the provisions of this notice. If the Controller does not need certain documents for the assessment of the job application of the data subject, it will delete or destroy them immediately.

If the data subject applies for a job for which the acquisition of a qualification, driving license or education is a prerequisite, the Controller will examine the relevant data.

Legal basis for processing

The processing of personal data is necessary to take steps at the request of the data subject prior to the conclusion of the contract, so the legal basis for the processing is paragraph (b) of Article 6(1) of the Regulation.

By submitting an application to the Controller for the advertised job, the data subject expresses his or her clear intention to fill the vacancy and to participate in the selection process required for this purpose. It is a necessary part of the selection process that the employer assesses the professional and personal qualities of the candidate beforehand in order to judge whether the candidate is suitable for the job.

Source of personal data

The source of personal data is the data subject applying for the advertised job. As the data subject is the source of the personal data, the Controller will inform him/her directly of any changes to the scope of the data processed when the data are collected.

Recipients of personal data provided

The personal data are processed by the employees of the Controller who have the right to make suggestions or decisions in relation to the advertised vacancy.

Processor(s):

If the CV is sent by the data subject by e-mail, the Controller will use the services of the following processor:

Google LLC -e-mail service provider of the Controller (Gmail).

The processor may process the personal data of the data subject only for the purposes specified by the Controller and contractually agreed upon, in accordance with the Controller's instructions, and has no autonomous decision-making power with regard to the processing. The processor has undertaken confidentiality obligations and contractual guarantees regarding the retention of personal data obtained in the course of its duties.

Transfer of personal data to a third country or international organization

Personal data will not be transferred directly by the Controller to any third country or international organization, however, personal data may be transferred by Google LLC as a processor to the United States or any other country in which Google LLC or its sub-processors operate.

Data is transferred by Google LLC in accordance with Chapter V of the Regulation, using model contracts defined by the competent body of the European Union, subject to additional technical and organizational measures. Google LLC provides detailed information about the data transfer and the technical and organizational measures used in the "Privacy Supplements" document. Google LLC's privacy policy, which covers all of its subsidiaries, is available here:

<https://policies.google.com/privacy?hl=>

Duration of the processing of personal data

Only until the position is filled permanently (the end of the probationary period of the selected person), but for a maximum of 1 year.

Automated decision-making and profiling

Neither of these occurs during the processing.

Provision of personal data

Providing personal data is not mandatory, but a condition of application.

2.5 RUNNING SOCIAL NETWORKING SITES

For any photos uploaded to our LinkedIn (<https://hu.linkedin.com/company/iconcontest>) social media page, we always request a consent statement from the individuals concerned. No other personal data is processed on the page.

2.5.1 Use of Social Media

In all cases where content is uploaded to a social media platform (e.g., iContest website, LinkedIn, etc.) that may contain personal data (e.g., name, photo), the individual concerned must declare whether the content can be uploaded or not. If consent is denied, the data controller will not publish the contested content. Otherwise, it can be shared, and the consent statement will be retained in electronic form for 5 years.

2.5.2 Wizzgrid

Purpose of Data Processing

The personal data provided for demo requests on the Wizzgrid website will be processed solely for the following purposes:

- Contacting and communicating with users.
- Providing the requested demo and presenting details of the service.

Scope of Personal Data Processed

The following personal data will be requested during a demo request:

- First name
- Last name
- Company name
- Position
- Email address

Legal Basis for Data Processing

The data processing is based on the data subject's consent under Article 6(1)(a) of the GDPR. Providing personal data is voluntary but necessary for the demo request.

The Controller has a legitimate interest in establishing and maintaining a business relationship with the company represented by the data subject, ensuring efficient fulfillment of the requested demo. Thus, the communication is necessary to establish economic cooperation and fulfill any contract(s) that may arise between the parties. The Controller will not process the data for any other purpose without a lawful basis.

Data Storage and Retention Period

The data provided during the demo request is stored in Google Sheets, which is protected with adequate security measures. GDPR Article 5(1)(e) states:

"Personal data [...] shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed." In marketing data processing, the data can only be retained as long as necessary to achieve the marketing objective or until the data subject withdraws consent. The data will be retained for a maximum of five years and then deleted, unless otherwise required by law or extended by the data subject's consent.

Data Processors

Data is processed using Google Sheets, provided by Google Inc. Google Inc.'s data handling and privacy practices comply with GDPR requirements. To ensure secure data storage and processing, we implement the necessary technical and organizational measures.

Data Processor(s): Google LLC – the Controller's email service provider (Gmail).

The Data Processor may only process personal data for the purpose specified and as instructed by the Controller, without independent decision-making authority. The Data Processor has committed to confidentiality obligations and contractual guarantees to protect personal data it encounters during its tasks.

Transfer of Personal Data to a Third Country or International Organization

The Controller does not directly transfer personal data to third countries or international organizations; however, Google LLC, as a data processor, may transfer personal data to the United States or other countries where Google LLC or its sub-processors operate. Transfers are carried out according to Chapter V of the GDPR, using standard contractual clauses approved by the European Union, along with supplementary technical and organizational measures. Detailed information on transfers and applied measures is available in Google LLC's "Data Protection Addendum" document. Google LLC's privacy policies are accessible here: [Privacy Policy – Privacy and Terms – Google].

Data Subjects' Rights

Data subjects are entitled to exercise the following rights:

- Right of access: They may request information about the personal data we process.
- Right to rectification: They may request correction of inaccurate data.
- Right to erasure: They may request deletion of their data if the processing purpose has ended or the processing is unlawful.
- Right to restrict processing: They may request restriction of processing if they contest the accuracy of the data or object to the processing.
- Right to data portability: They have the right to request the transfer of their data in electronic form or to another controller.

Lodging a Complaint

If data subjects believe their personal data is not processed in accordance with applicable data protection laws, they may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).

Cookie Management

At iContest Kft., operator of the Wizzgrid website, we prioritize compliance with the GDPR, which requires prior user consent if cookies handle personal data or are not essential for the basic operation of the website (e.g., analytical or marketing cookies). The Data Protection Policy and website pop-ups must clearly inform users about cookie usage and provide options for cookie management (acceptance or rejection).

On our website, the use of cookies is based on the consent of the data subject.

Data Management and Google Analytics, Cookies

We use Google Analytics on our website to measure and analyze user behavior. This allows us to improve the user experience and collect statistical data on how visitors use the site. Through Google Analytics and cookies, we collect the following information:

- **Page views:** We track which pages were clicked on and how often they were viewed.
- **First visit to the website:** We record when a user first visits the website.
- **Start of session:** We note the start time of the session.
- **Navigation on the website (Your "click path", interaction with the website):** We track clicks and the user's navigation path.
- **Scrolls:** Scrolling to the bottom of the page (viewing 90% of the page).
- **Clicks on external links:** We record when external links are clicked.
- **Internal search queries:** We record searches conducted on the website.
- **Interaction with videos:** We note user interactions with videos.
- **Ads seen/clicked:** We track which ads were seen and clicked on.

In addition, the following data is also collected:

- **Your approximate location – region:** Information regarding the user's region.
- **IP address:** IP addresses are stored in a shortened form to ensure data protection.
- **Technical information:** Information about the browser and devices used (e.g., language settings, screen resolution).
- **Your internet service provider:** We record the name of the user's internet service provider.
- **Referrer URL:** The website or advertising channel through which the user arrived.

Deleting/Disabling Cookies

Every browser allows users to modify their cookie settings. However, the purpose of cookies is to make our website easier to use and more functional. Blocking or deleting cookies may result in users not being able to fully use all of the website's features, or the website may function differently than intended in their browser.

Usually, cookie settings can be found in the "Settings" menu of the browser. The following links may also help with cookie settings, and more information can be found in the "Help" menu of each browser.

Descriptions of cookie settings for the most popular browsers can be found at the following links:

- Firefox
- Opera
- Google Chrome
- Internet Explorer 11

- Internet Explorer 10
- Safari

Withdrawing Consent

After consenting to the use of cookies, the browser stores cookies on the user's computer or other device so our system can recognize the settings. The consent may expire over time. However, it can be withdrawn at any time via the browser's cookie settings.

More Information about Cookies

Detailed information about cookies can be found at <https://policies.google.com/technologies/cookies?hl=en-US>, and further details on how to disable them are available at <https://tools.google.com/dlpage/gaoptout>.

Types of Cookies

Cookies are small files that the website places on the user's device to improve the user experience or ensure the website's functionality. Types of cookies:

- **Session cookies:** These are temporary and are automatically deleted when the browser is closed. They are necessary for the website's operation, such as retaining a user's login or shopping cart.
- **Persistent cookies:** These cookies remain on the user's device after the browser is closed and can be retrieved later, for example, to retain website preferences.
- **Functional cookies:** These help the website function properly, such as saving language settings or other personalized options.
- **Analytical and statistical cookies:** These cookies allow website owners to collect statistical data about user behavior on the site.
- **Advertising cookies:** These track users' browsing habits to display personalized ads.

Data Processor(s):

Google LLC – the data controller's email service provider (Gmail).

The data processor may only handle the personal data as specified by the data controller and as outlined in the contract. The processor has no independent decision-making authority regarding data handling. The data processor has committed to confidentiality and contractual guarantees to protect personal data encountered during its duties.

Transfer of Personal Data to a Third Country or International Organization

The data controller does not directly transfer personal data to any third country or international organization. However, it is possible that personal data may be transferred by Google LLC, as a data processor, to the United States or any other country where Google LLC or its subprocessors operate. Data transfers are conducted in compliance with Chapter V of the GDPR, using standard contractual clauses defined by the European Union, along with supplementary technical and organizational measures. Google LLC provides detailed information on these measures in its "Data Privacy Addendum" document. The data privacy policies applicable to all Google LLC subsidiaries can be found here:

[Privacy policy - Privacy & Terms Google](#)

2.6 DATA PROCESSING IN THE CONTEXT OF ETHICS AND COMPLIANCE NOTIFICATIONS

Purpose of processing: iCONTEST Kft. manages on anonymous reporting platforms the possibility to submit notifications based on Sections 13 and 14(1) of Act CLXV of 2013 on Complaints and Notifications of Public Interest in case of a violation of the law or the provisions of the Codes of Ethics

and Business Conduct iCONTEST Kft.

iCONTEST Kft. processes the personal data of the data subjects for the purposes of receiving and investigating the Ethics and Compliance notification, remedying or terminating the conduct that is the subject of the notification and informing the notifier as follows:

Personal data processed

- a) If the notifier provides his/her name and contact details (postal address, e-mail address, telephone number) in his/her request
- b) Name and other particulars of the natural person concerned by the notification and the personal data indispensable for the investigation of the notification.

Legal basis for processing

The legal basis for processing is the legitimate interest of the Controller. Pursuant to Sections 13-16 of Act CLXV of 2013 on Complaints and Notifications of Public Interest, the data controller has a legitimate interest in receiving and investigating Ethics and Compliance notifications, in remedying or terminating the conduct that is the subject of the notification, and in processing the data necessary to inform the notifier.

Source of personal data

The source of the personal data is the notifier, the natural person concerned by the notification or the result of the investigation.

Recipients of personal data provided

The personal data are processed by only the employees of the Controller who are involved in receiving and investigating the notification, remedying or terminating the conduct that is the subject of the notification or informing the notifier.

Processor(s):

Google LLC - e-mail service provider of the Controller (Gmail).

The processor may process the personal data of the data subject only for the purposes specified by the Controller and contractually agreed upon, in accordance with the Controller's instructions, and has no autonomous decision-making power with regard to the processing. The processor has undertaken confidentiality obligations and contractual guarantees regarding the retention of personal data obtained in the course of its duties.

Transfer of personal data to a third country or international organization

Personal data will not be transferred directly by the Controller to any third country or international organization, however, personal data may be transferred by Google LLC as a processor to the United States or any other country in which Google LLC or its sub-processors operate. Data is transferred by Google LLC in accordance with Chapter V of the Regulation, using model contracts defined by the competent body of the European Union, subject to additional technical and organizational measures. Google LLC provides detailed information about the data transfer and the technical and organizational measures used in the "Privacy Supplements" document. Google LLC's privacy policy,

which covers all of its subsidiaries, is available here:

<https://policies.google.com/privacy?hl=hu>.

Duration of the processing of personal data

If the investigation establishes that the notification is unfounded or that no further action is necessary, the Controller shall delete the personal data of the data subject within 60 days of the end of the investigation.

If action is taken on the basis of the investigation, including ethical or disciplinary proceedings and legal proceedings, the Controller will process the data until the action taken on the basis of the notification becomes final.

Automated decision-making and profiling

Neither of these occurs during the processing.

Provision of personal data

Of the personal data, the provision of the contact details of the notifier and the name and other particulars of the natural person concerned by the notification is not mandatory, but their absence may prevent the effective investigation of the conduct or omission described in the notification and the provision of information to the notifier.

3 RIGHTS OF DATA SUBJECTS IN RELATION TO PROCESSING

Right to be informed

The data subject has the right to be informed about the processing of his/her personal data, which the Controller shall provide by means of this notice.

Consent-based processing

Where the legal basis for processing is the data subject's consent, he/she has the right to withdraw his/her consent to the processing at any time. However, it is important to know that the withdrawal of consent can only apply to data for which there is no other legal basis for processing. If there is no other legal basis for the processing of the personal data concerned, the Controller will permanently and irretrievably erase the personal data following the withdrawal of consent.

Under the Regulation, withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

Right of access

At the request of the data subject, the Controller will at any time inform the data subject whether or not his/her personal data are being processed and, if so, provide access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom or with which the Controller has disclosed or will disclose the personal data including, in particular, recipients in third countries or international organizations;
- d) the planned duration of storage of the personal data or, if it is not possible, the criteria for the definition of such period;
- e) the data subject will also be informed of his/her right to obtain from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning him/her and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority or to take legal action;
- g) where the data have not been collected directly from the data subject by the Controller, any available information on the source of the data;
- h) where automated decision-making is carried out, the fact of such processing, including profiling and, at least in those cases, the logic used, i.e., the significance and the envisaged consequences of such processing for the data subject.

Right to rectification of personal data

The data subject shall have the right at any time, upon request and without undue delay, to obtain from the Controller the rectification of inaccurate personal data relating to him/her. Taking into account the purpose of the processing, the data subject also has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

In the case of a request for rectification (amendment) of data, the data subject must substantiate the accuracy of the data requested to be rectified and must also certify that the person who requests the amendment is entitled to the amendment. Only in this way can the Controller assess whether the new data is real and, if so, whether it can modify the previous data.

The Controller further draws the attention of the data subject to the need to notify any change in his/her personal data as soon as possible, thus facilitating lawful processing and the exercise of his/her rights.

Right to erasure

At the request of the data subject, the Controller will delete personal data relating to the data subject without undue delay where one of the following grounds applies:

- a) the Controller no longer needs the personal data for the purposes for which they were collected or otherwise processed;
- b) where processing is based on consent, the data subject withdraws consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing or objects to processing for direct marketing purposes;
- d) the personal data have been unlawfully processed by the Controller;
- e) the personal data must be erased in order to comply with a legal obligation in Union or Member State law to which the Controller is subject;
- f) personal data are collected in connection with the offer of information society services.

Right to restriction of processing

The data subject has the right to obtain, at his/her request, to obtain from the Controller restriction of processing where one of the following conditions is met:

- a) he/she contests the accuracy of the personal data; in this case, the restriction applies for the period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead;

- c) the Controller no longer needs the personal data for the purposes of processing but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to the processing; in this case, the restriction applies for the period until it is verified whether the legitimate grounds of the Controller override those of the data subject.

Right to object

Where the processing of the personal data is based on the legitimate interests of the Controller (paragraph (f) of Article 6(1) of the Regulation) or is necessary for the performance of a task carried out in the exercise of official authority vested in the Controller (paragraph (e) of Article 6(1) of the Regulation), the data subject has the right to object at any time, on grounds relating to his/her particular situation, to the processing of his/her personal data, including profiling based on those provisions.

Where the data subject's personal data are processed by the Controller for direct marketing purposes (e.g., sending information letters), the data subject has the right to object at any time to the processing of personal data concerning him/her for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of his/her personal data for direct marketing purposes, the personal data may no longer be processed for these purposes.

Interest balancing test

Where the legal basis for the processing of personal data is the legitimate interest of the Controller or a third party within the meaning of paragraph (f) of Article 6(1) of the Regulation, the Controller prepares a written "interest balancing test" pursuant to preamble paragraph 47 and Article 5(2), which the data subject may request by sending an e-mail to adatvedelmiincidens@icontest.hu.

Right to data portability

The data subject has the right to receive the personal data concerning him/her which he/she has provided to the Controller in a structured, commonly used, machine-readable format and the right to have those data transmitted by the Controller to another controller if:

- (a) the processing is based on the data subject's consent or a contract within the meaning of paragraph
- (b) of Article 6(1) of the Regulation; and
- (c) the processing is carried out by automated means.

4 PROCEDURES FOR ENFORCING THE RIGHTS OF DATA SUBJECTS

The data subject may exercise the above rights by sending an electronic mail to adatvedelmiincidens@icontest.hu, by post to the Controller's registered office or in person by visiting the Controller's registered office. The Controller will start the examination and execution of the data subject's request without undue delay after receipt.

The Controller will inform the data subject of the measures taken on the basis of the request within 30 days of receipt. If the Controller is unable to comply with the request, it will inform the data subject of the reasons for the refusal and of his/her rights of redress within 30 days.

Within five years of the death of the data subject, the rights of the deceased as set out in this notice, which the data subject enjoyed during his/her lifetime, may be exercised by a person authorized by the data subject by means of an administrative arrangement or a declaration in a public document or a private document having full probative force to that effect made with the Controller or, if the data subject made several declarations with a controller, by a declaration made at a later date. If the data subject has not made a corresponding declaration of rights, his/her close relatives within the meaning of the Civil Code have the right to exercise the rights under Articles 16 (right to rectification) and 21 (right to object) of the Regulation and, if the processing was unlawful during the data subject's lifetime or the purpose of processing ceased upon the death of the data subject, under Article 17 (right to erasure) and 18 (right to restriction of processing) of the Regulation, within five years of the death of the data subject.

The right to exercise the rights of the data subject under this paragraph can be exercised by the close relative who first exercises that right.

5 RIGHT TO REMEDY IN RELATION TO DATA PROCESSING

In order to enforce his/her right to judicial remedy, the data subject may take legal action against the Controller if he/she considers that the processing of his/her personal data by the Controller or by a processor or joint controller acting on our behalf or on our instructions is in breach of the requirements laid down by law or by a binding legal act of the European Union for the processing of personal data. The court is acting out of turn in the case. Hearing the case falls within the competence of regional courts. The lawsuit may also be brought, at the option of the data subject, before the court of the place of residence or domicile of the data subject or the court for the registered office of the Controller (Regional Court of Budapest).

Anyone may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) against the Controller, alleging that the processing of personal data has resulted in a violation of rights or an imminent threat thereof, or that the Controller is restricting the exercise of rights related to the processing of personal data or is refusing an application for exercising such rights. Notifications can be made to one of the following contacts:

Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH, National Authority for Data Protection and Freedom of Information)

Postal address: 1363 Budapest, Pf. 9.

Address: 1055 Budapest, Falk Miksa utca 9-11.

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

6. Handing of personal data breach

Personal data breach can be reported by sending a message to the adatvedelmiincidens@icontest.hu e-mail address, describing the nature of the personal data breach, if possible, the categories and the relevant number of data subjects, the categories and the relevant number of data affected by the personal data breach and the measures taken to remedy the negative consequences, if such measures are taken.

Any personal data breach must be notified by the Controller to the competent supervisory authority, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of natural persons.

A personal data breach must be reported within 72 hours of receiving the information, via the NAIH's reporting system on the <https://www.naih.hu/adatvedelmi-incidensbejelento-rendszer> interface.