

PRIVACY POLICY

extract

The purpose of this privacy policy extract is to provide legal, fair and transparent protection and procession of the personal data of the clients in contact or contract with the ECS Consulting Services Ltd. (14 Alig str. Budapest, H-1132, company registration N^o: 01-10-140744, hereinafter as **Processor**) or visitors of the Processor's website (hereinafter as **Data subject**), and further ensure that adequate information is given in accordance with the Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter as **Privacy Act**).

Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: **General Data Protection Regulation**) and the Privacy Act shall apply to the certain processing of personal data mentioned in this extract.

The website may contain links forwarding to other websites, but the Processor has no influence on the privacy policies of those sites. As long as the Data subject leaves our website using one of those links, data processing rules of the owner of the forwarded website are applicable.

1. PROCESSING OF PERSONAL DATA

1.1. Customer's data

Purpose of processing: Providing services, invoicing, fulfil orders and accounting duties.

Legal basis of processing: The Data subject's consent and the fulfilment of the contract signed by the Processor. Regarding the invoicing and the preservation of the invoice the Act C of 2011 on Accounting is applicable.

Processed data: Purchase, invoicing: name, address, services, quantity, price, invoice number, date. Order: phone number, e-mail address.

Time frame: For purchases, 5 years. Regarding the invoice, 8 years.

1.2. Temporary or permanent residence permits, employment, and processing of data regarding other services

The personal data processed may vary depending on the type of service. The Processor processes the necessary data laid down in the law.

Purpose of processing: Fulfilment of the services ordered by the client (acquiring or extending residence permits or any other services)

Legal basis of processing: The Data subject's consent and the fulfilment of the contract signed by the Processor.

Processed data: name, maiden name, date and place of birth, phone number, e-mail address, mother's name, address, permanent address abroad, Hungarian address, citizenship, passport, working position to be fulfilled in Hungary, Hungarian employer's data, qualifications, start of employment in Hungary, mother tongue, spoken languages, spouse, child(ren), monthly salary, rental fee, data of the rented real estate, marriage certificate, birth certificate, social security number, VAT number, monthly income, private security, business trips, temporary or permanent residence permit numbers, work permit number, bank account number.

Time frame: 5 years after completion of the services.

The Processor may forward the personal data to the competent authorities and other partners in contract in order to complete the services depending on the type of the case. Please note that these authorities and partners process the data by their own privacy policy.

1.3. Personal data in contract

The Processor stores the contracts on a paper basis and protects them.

Purpose of the processing: contact persons' and natural persons' data for the feasibility of the contract.

Legal basis of processing: completion of the contract, regarding the contact person it is in the best interest of the contracting partner.

Processed data: contact persons' name, e- mail address, phone number. Clients: name, mother's name, date and place of birth, address, VAT-number, phone number, e-mail address.

Time frame: until the contract is in force, afterwards until the expiry date. IN case of a legal dispute, until the end it.

1.4. Data needed for information regarding the Processor's services, getting a quotation

Purpose of the processing: fulfilment of seeking for quotation and information for the natural persons getting in contact with the Processor.

Legal basis of processing: the client's consent.

Processed data: clients' name, e-mail address, and other relevant data needed for the fulfilment of seeking for quotation and information.

Time frame: until the completion of the information request or the withdrawal of the written consent. Regarding the quotation, 6 months after the inquiry.

1.5. Processing regarding IT services

The Processor hires an external company for the management of the IT systems and as a recipient they are processing the personal data on the website, in the e-mails and any other data required for the fulfilment of the services consented to voluntarily, and those mentioned in the previous chapters to the necessary extent.

The list of IT recipients of the Processor:

Name	Contact details:	Recipient's task
Tárhely.Eu Kft.	support@tarhely.eu	E-mail services
Tárhely.Eu Kft.	support@tarhely.eu	Storage services
Tárhely.Eu Kft.	support@tarhely.eu	System operation

1.6. Other provisions and processing

We would like to draw your attention that after consenting to any data processing, Data subjects can withdraw it anytime. However, without providing the data necessary for completing our services, the Processor will not be fulfilling any services, giving out information or quotation for the Data subject.

We give information about processing not mentioned above when first receiving data. Special data can only be processed exceptionally, if the Data subject consents explicitly in written form, or the data is required by law in order to fulfil the completion of the service, or necessary for the proposal, validation or protection of a legal claim, and the successful completion of the service is not possible without it.

The court, the prosecutor, the investigative authorities, the infringement authorities, the public administration authority, the National Authority for Data Protection and Freedom of Information (hereinafter: **the NAIH**) and by legal authority other bodies may look for the Processor to request information, data sharing, or providing data and documents. The Processor is entitled to give out data to the authorities to the extent it is necessary for the successful completion of the inquiry.

2. THE STORAGE OF DATA, THE SAFETY OF DATA PROCESSING

The Processor has carried out proper technical and organizational measures to guarantee the safety of the data regarding the extent of any risks occurring, including encrypting the personal data, guaranteeing the constant confidential nature, integrity, availability and rigidity of the systems and services. Should any incident occur, the Processor shall guarantee access and restoration of the data in time, regular testing, assessment and evaluation of the efficiency of technical and organizational measures.

3. CONTACT DETAILS OF THE PROCESSOR

ECS Consulting Services Private Limited Company
Registered office: Alig str. 14. 7th floor, Budapest, H-1132
Company registration number: 01-10-140744
Registry office: Registry Court of the Budapest-Capital Regional Court
E-mail address: ecsconsultingzrt@gmail.com
Phone number: +36 1 612 24 71

4. THE RIGHTS OF THE DATA SUBJECT

4.1. General provisions and the rights of the Data subject regarding data processing

This extract contains the information related to the personal data of the Data subject. The Processor should inform the Data subject about the measures taken on their request without unnecessary delay in no later than 1 month after the receipt of their request. The deadline can be extended by 1 month if necessary. If the processor does not take any measures regarding the request, it should inform the Data subject about the reasons and the possible legal remedies.

4.2.1. The right to access

The Data subject is entitled to receive feedback from the Processor whether the procession of their data is in progress. If yes, they are also entitled to access their personal data and any other information about the data procession mentioned in this extract. The Processor should provide the copy of the personal data to the Data subject.

4.2.2. The right to rectification

The Data subject is entitled to ask the Processor to rectify their inaccurate personal data without unnecessary delay or to request their amendment.

4.2.3. The right to erase

The Data subject is entitled to request the Processor to erase their personal data. The Processor erases the personal data without unnecessary delay, if:

- (i): there is no need for the personal data for the purpose it was gathered or processed
- (ii): the Data subject revokes its consent, and there is no other legal ground for data processing
- (iii): the Data subject objects against data processing, and there is no legal dispute or procedure against them, or there is no high-priority legal cause for data processing, or the Data subject objects against data processing for the purpose of direct marketing

(iv): their personal data were processed illegally,

(v): the personal data must be erased due to legal obligations towards the Processor

(vi): the data processing was in relation to the information society service recommended for children.

The Processor is not obliged to erase the data if data processing is necessary for the freedom of expression or freedom of information, for the fulfilment of legal obligations or archiving purposes in the public interest, for the establishment, exercise or defence of legal claims.

4.2.4. Right to restriction of processing

The Data subject has the right to ask the Processor to restrict processing, if:

(i): the accuracy of the personal data is contested by the Data subject

(ii): the processing is unlawful and the Data subject opposes the erasure of the personal data and requests the restriction of their use instead;

(iii): the Processor no longer needs the personal data for the purposes of the processing, but they are required by the Data subject for the establishment, exercise or defence of legal claims;

(iv): the processing is necessary for archiving purposes in the public interest, or it is necessary for the enforcement of rightful claims of the Data subject or a third party, and the Data subject objected against data processing for this purpose.

Restricted personal data shall, with the exception of storage, only be processed with the Data subject's consent 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 reasons of important public interest. The Processor asking for lifting the restrictions shall be informed about it beforehand.

The Processor shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

4.2.5. The right to object

The Data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling, if the the processing is necessary for archiving purposes in the public interest, or it is necessary for the enforcement of rightful claims of the Data subject or a third party. The Processor shall no longer process the personal data unless the 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 concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the Data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where personal data are processed for statistical purposes, the Data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

4.2.6. Right to data portability

The Data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is carried out by automated means.

In exercising his or her right to data portability, the Data subject shall have the right to have the personal data transmitted directly from one Processor to another, where technically feasible.

4.2.7. Automated individual decision-making, including profiling

The Data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her except (i) the decision is necessary for entering into, or performance of, a contract between the data subject and a data controller; (ii) it is authorised by law to which the Processor is subject and which also lays down suitable measures to safeguard the Data subject's rights and freedoms and legitimate interests; (iii) it is based on the data subject's explicit consent.

4.2.8. Communication of a personal data breach to the Data subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Processor shall communicate the personal data breach to the Data subject without undue delay. In other cases, there shall be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

5. LIABILITY, REMEDIES AND PENALTIES

With regards to the liabilities of the Processor and the rules of penalties, the GDPR, the Privacy Act and other relevant acts shall be applied.

The Data subject has the right to ask for information about his or her rights at the NAIH, or to initiate an investigation relating to encroachment of his or her rights or the immediate risk of encroachment or to ask a legal process of the National Authority for Data Protection at the following contact details:

Nemzeti Adatvédelmi és Információszabadság Hatóság
Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Postal address: 1530 Budapest, Pf.: 5.
Telephone: +36 1 391 14 00 Fax: +36 1 391 14 10
E-mail: ugyfelszolgalat@naih.hu
Web: <http://www.naih.hu>

During legal disputes about data processing Hungarian Law shall be applied, during judicial proceedings Hungarian judiciaries have exclusive authority and jurisdiction.

6. MODIFICATION

Present Privacy Policy can be modified unilaterally by the Processor in the future.

Budapest, 15th September 2021.

ECS Consulting Services Private Limited Company