

Data Processing Policy (in case of sending an e-book)

Data controller:

- Data controller: DSS Consulting Ltd.
- Head office: 1121 Budapest, Denevér köz 2.
- Tax Number: 11774608-2-43
- Corporate Registration Number: 01-09-680982

1. Introduction

The data controller allows for a call for an offer on the gdprsolution.com website. This document contains all the personal data processing activities related to the offer.

The main responsibility of the data controller is to protect personal data and to ensure the exercising of the rights in relation to the processing of personal data. This present document is a declaration regarding the protection of personal data, the purposes and means of the processing.

This document was drafted with special focus on the relevant regulations and the most important international recommendations listed below:

- The General Data Protection **Regulation (EU) 2016/679** (GDPR) Regulation (EU) 2016/679 of the European Parliament and of 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 (General Data Protection Regulation)
- Act CXII of 2011 on information self-determination and freedom of information
- Act V/2013 promulgating the Civil Code.

2. Data processing activities

2.1

Name of data processing activity:	E-book sending
Purpose of the processing:	Sending e-books for those who signed up
Personal data that are being handled:	Name, Company Name, email address, Phone Number
Data subjects:	Subscribers
Legal basis of processing:	Consent of the data subject (based on article nr.6 GDPR)
Duration of data processing:	30 days from data entry
Addressees:	Colleagues of the data controller

Name and address of data processor, activities related to data processing: —

3. Data sources:

data subject(s)

4. Data Transfer:

Transfer of personal data to third parties is prohibited unless it is requested by official authorities and is in compliance with a legal regulation. If the data transfer is requested by official authorities and is in compliance with a legal regulation the data controller shall transfer the requested information. (Indicating possible criminal acts or threats to public security, as stated in an official decision for seizing data).

5. Actual place of data processing:

1113 Budapest, Nagyszőlős str. 11-15.

6. Data processing technology:

Automated information system

7. Rights of the data subject:

7.1. Rights of the data subject: It is essential to us that you are aware of the rights related to the processing of your personal data. For this reason we would like to inform you that as the data subject you have rights that you can exercise related to the data handed into our care.

7.2. Right to withdraw consent: In the case of data processing mentioned in sections 2.1 and 2.3. you have the right to withdraw your consent in a written declaration to the data controller. In this case your personal data cannot be processed any longer.

7.3. Right to access your data: Contacting us, you have the right at any time, to receive adequate information concerning the processing of your personal data, to find out if they are being processed or not. If they are being processed, you have the right to access them, and also receive a copy of them along with information about the way of processing.

7.4. Information about the way of processing your data will include:

- the purpose of data processing,
- what kind of personal data are being processed,
- destination of transmitted data,

- data storage period,
- you can ask for rectification, erasure or restriction of processing of your data or you can object to data processing
- you can address to the supervisory authority if you have a complaint (www.naih.hu)
- if data has been transferred to us from a third party, you have the right to obtain all the information related to this

7.5. Right to rectification: Sending a declaration, you have the right to obtain from the controller without undue delay the rectification of inaccurate personal data or to have your data completed where incomplete.

7.6. Right to erasure: Sending a declaration, you have the right to obtain from the controller the erasure of your personal data without undue delay if:

- You withdraw consent given to process certain data
- You exercise your right to object
- The personal data have to be erased for compliance with a legal obligation
- You are concerned about your personal data being unlawfully processed

7.7. Right to restriction of processing: If you have a concern regarding the accuracy, purpose or lawfulness of the processing of your personal data, by sending a declaration to the controller you can ask for the restriction of processing. You can also ask for the restriction of processing when your data are not needed any longer, but you as the data subject, can require them for the advancement, enforcement or vindication of a legal case. You can ask for the restriction of data processing when you have concerns regarding the lawful interest of the processing. You will be previously notified when the restriction ends

7.8. Right to data portability: You have the right to receive the personal data that you provided to the controller in a structured, commonly used and machine-readable format or transmit those data to another controller without hindrance.

The rights listed above can be exercised by sending an email to info@dss.hu, or a letter to this address: 1113 Budapest, Nagyszőlős str. 11-15. The controller will perform your request in no longer than a month.

7.9. As a data subject you can address your complaint to:

- **National Authority for Data Protection and Freedom of Information**
- Head Office: 1125 Budapest, Szilágyi Erzsébet alley 22/C
- Postal address: 1530 Budapest, Pf. 5
- Phone Number: +36-1-391-1400 / Fax: +36-1-391-1410

- E-mail: ugyfelszolgalat@naih.hu
- Website: <http://www.naih.hu>

7.10. Law enforcement: In case of the unlawful processing of your personal data you have the right to start a legal proceeding against the controller. This legal proceeding, based on your choice, can be started at the court of your residence.

8. Data Security

In order to protect the data processing the controller shall implement appropriate technical, management and organisational measures that ensure the level of security appropriate to the risk. The information systems are chosen and operated in such a way that: a) the processed data will be accessible to those that have the right to handle them (availability); b) its authenticity and authentication is ensured (authenticity of processing); c) its uniformity can be proved (data integrity); d) it can be accessed only by the authorized persons, it is protected against any unauthorized access (data confidentiality)

We take all the necessary measures to ensure the security of personal data both in the course of network communication (online data handling) and in the course of data storage (offline data handling)

As soon as personal data enter the controller's infrastructure, the controllers are responsible to perform all the activities related to data storage and protection in compliance with the inner regulations where the guiding principles, proceedings and security controls are described. Personal data are available only to those who perform these activities applying high level of data access control procedures.

Along the technical measures a very important one is the protection of the server by a firewall and the application of security protocols. Administrative measures include password protected access and supervision of authorizations, password changes from time to time. Such control mechanisms are the verification of access to data and the appropriate infrastructures and also agreements signed with third parties with the obligation to complete adherence to relevant regulations. Right from the configuration of our services we focus on the implementation of the appropriate data security measures. The report about the erasure of personal data is being saved for 10 years.

In case you need additional information that is not included in this present Data Processing Policy or you have an observation, concern regarding data processing, the data controller is at your disposal and can be contacted as described at point 7.8.

Budapest, 5 August 2019.

DSS Consulting Ltd.