

General Policy on Data Protection
for customers, suppliers, website visitors, personal visitors who qualify as Data Subject
(hereafter: **Privacy Policy**)

Equip-Test Company Group, as controller (hereafter: **Controller**) gives the following information to

- natural person customers, suppliers, personal visitors, website visitors who give their personal data at/to the Controller's website, customer service, contact keeper with the suppliers (in person, over phone or by electronic means) (hereafter: **Data Subjects**)

regarding processing of their personal data:

- We welcome your interest in our company and the products we sell. The protection of your personal data is very important to us, so we provide detailed information about our data processing below.
- The Controller strictly observes the applicable data protection provisions during the use and processing of personal data. We only process personal data in accordance with the applicable data protection laws; the right to use personal and anonymous data belongs to the Controller to the extent permitted by the relevant European Union and Hungarian law, while maintaining your rights elaborated below.
- The primary task of the Controller is to determine the scope of personal data processed by it, the legal basis and purpose of data processing, the means and methods of processing, and to ensure the constitutional principles of data protection and data security requirements and to prevent unauthorized access to personal data, modification or unauthorized disclosure or use of the personal data, and to ensure protection against erasure, damage, destruction of the personal data.
- This Privacy Policy describes in detail your rights, options in connection with data processing, and Equip-Test's data protection obligations and measures, as well as your data protection obligations and rights.

When you contact us, you acknowledge that we will process certain of your personal data in accordance with this Privacy Policy, depending on the nature of your contact.

1. DEFINITION OF CONTROLLER, PERSONAL DATA AND DATA SUBJECT

Controller: the legal person who determines the purposes and means of the processing of personal data, either individually or in association with others. The scope of this Privacy Policy extends to those members of the Equip-Test company group who are covered by the GDPR (hereinafter collectively referred to as: **Equip-Test Company Group, or Equip-Test, or Controller**).

For the purpose of this Privacy Policy the following companies are **members of the Equip-Test Company Group and are a Controller:**

HUNGARY

Name: Equip-Test Kft.

Registered and mailing address: 2220 Vecsés, Vágóhíd u. 19, Hungary

Branch office: 7211 Dalmand, Kossuth Lajos utca 7, Hungary

POLAND

Name: Equip-Test Sp. z.o.o.

Registered and mailing address: Torowa 3C 30-435 Krakow, Poland

Branch office: Cyfrowa 6 71-441 Szczecin, Poland Building F3, office B 1.08, Poland

CZECH REPUBLIC

Name: Equip-Test s.r.o.

Registered and mailing address: Filipínského 4460/59 CZ 602 00 Brno, Czech Republic

SLOVAKIA

Name: Equip-Test s.r.o.

Registered and postal address: Čechinová 16/G SK 821 05 Bratislava, Slovakia

ROMANIA

Name: Equip-Test srl

Registered and mailing address: Str. Locomotivei Nr.4 410431 Oradea, Romania

GERMANY

Name: Equip-Test GmbH

Registered and mailing address: Max-Stromeyer-Str. 116, D-78467 Konstanz, Germany

BULGARIA

Name: Equip-Test o.o.d.

Registered and postal address: ul."Uzundzhovska" 12, 1000 Sofia Center, Szófia, Bulgaria

SCANDINAVIA AND BALTIC REGION

Name: Equip-Test o.ü.

Registered and mailing address: Vana-Narva maantee 30/1.74114, Maardu, Harju maakond, Estonia

Representative of the Controller:

Róbert Magyar

Contact details of the representative of the Controller:

2220 Vecsés, Vágóhíd u. 19, Hungary

e-mail address: dpo@equip-test.com

Personal data: For the purposes of this Privacy Policy **personal data is any information relating to an identified or identifiable natural person (the Data Subject)**. An identifiable natural person is one who can be identified, directly or indirectly in particular by reference to an identifier (**such as** a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).

Data Subject: natural person customers, suppliers, personal visitors, website visitors who give their personal data at/to the Controller's website, customer service, contact keeper with the suppliers (in person, over phone or by electronic means).

2. SUBJECT MATTER OF PRIVACY POLICY, LEGISLATION SERVING AS BASIS FOR PROCESSING

The subject matter of this Privacy Policy is the data processing in connection with **conducting of the Controller's business activity - including quoting, requesting quotations, responding to inquiries, fulfilling and invoicing sales and supplier contracts (product purchase, product sales, warranty and guarantee enforcement), complaint handling, factory data certification, product development, customer feedback, non-contractual damages, claims related data processing.**

The main legal regulations concerning data processing in accordance with this Privacy Policy and their abbreviations used in this Privacy Policy:

- 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 (hereafter: **GDPR**)
- The Fundamental Law of Hungary (hereafter: **Fundamental Law**) VI. Article
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereafter: **Privacy Act**)
- Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (hereafter: **Security Services Act**)

This Privacy Policy takes into account the recommendation of the Hungarian National Authority for Data Protection and Freedom of Information (hereafter: **NAIH**) on the data protection requirements of prior information.

3. LEGAL BASIS FOR PROCESSING PERSONAL DATA BY CONTROLLER

The legal basis for processing the Data Subject's personal data is determined based on the respective situation. You can find the legal basis that applies on your situation in [the table included into Point 12 herein](#).

The data processing in most cases is based on the Data Subject's freely given consent to the processing of her/his personal data freely given by the Data Subject to the Controller, in accordance with Article 6 (1) (a) of the GDPR.

By providing your personal data, you declare that you have read and expressly accepted the version of this Privacy Policy in force at the time of providing your personal data.

You have the right to withdraw your consent to data processing at any time - in the case of consent-based data processing -, in which case your personal data provided will be deleted immediately.

The freely given nature of the consent is ensured by the Controller in such a way that the Data Subjects have a real, free from external influence decision-making right regarding the granting and revocation of the consent. Refusal of consent shall not have adverse consequences for those concerned.

4. PURPOSE OF PROCESSING PERSONAL DATA BY CONTROLLER

The purpose for processing the Data Subject's personal data is determined based on the respective situation. You can find the purpose that applies on your situation in the table included into Point 12 herein.

5. SCOPE AND SOURCE OF PERSONAL DATA PROCESSED BY CONTROLLER

The scope of the personal data processed by Controller is determined based on the respective situation. You can find the scope of the personal data that applies on your situation in the table included into Point 12 herein.

Data source: directly from the Data Subject.

6. PERSONS AUTHORISED TO CONTROL AND ACCESS PERSONAL DATA, GROUNDS FOR TRANSFER OF DATA

In the course of processing personal data by the Controller in accordance with this Privacy Policy, the personal data of the Data Subject may be fully disclosed by the person (s) involved in the administrative procedure (e.g. e.g. customer service, contact keepers with the suppliers, keepers of administrative records) and the Controller's management.

The persons entitled to access the data in accordance with this Privacy Policy are also listed in the table included into Point 12 herein.

In case of **the Processors listed in Point 9 below**, the reason for the data transfers by the Controller is that the Processors can perform their data processing activities described in Point 9.

7. PERIOD, DEADLINE FOR PROCESSING AND STORAGE OF PERSONAL DATA

The period of the processing and storage of the Data Subject's personal data is determined based on the respective situation. You can find the period of

the processing and storage that applies on your situation in the table included into Point 12 herein.

8. SECURITY OF PERSONAL DATA

The Controller must inform the Data Subject on processing of her/his personal data.

The Controller undertakes to ensure the security of the personal data processed by it.

Taking into account the available technology and the cost of implementation, as well as the nature, scope, circumstances and purposes of data processing and the varying likelihood and severity of risks to the rights and freedoms of natural persons, the Controller will ensure that the data recorded, stored or processed are protected and prevent their destruction, unauthorized use and unauthorized alteration.

The Controller also undertakes to call on all third parties to whom the data is transmitted or transferred on any legal basis **to comply with the Controller's data security requirements**.

The Controller shall ensure that the processed data cannot be accessed, disclosed, transmitted, modified or deleted by unauthorized persons. The processed data may be accessed only by the Controller and its employees, as well as by the Processor(s) used by the Controller according to authorization levels. They will not be transferred by the Controller to a third party who is not entitled to access the data.

The Controller protects the IT systems with a firewall for the security of the IT systems and uses a **virus detection and anti-virus program** to prevent external and internal data loss. The Controller also ensured that inbound and outbound communication in any form is properly controlled to prevent abuse.

The Controller or the Processor classifies and treats personal data as confidential data. In order to protect the electronically managed data files in the various registers, the Controller shall ensure that the data stored in the registers, with the exceptions specified by law, **cannot be directly linked and assigned to the Data Subject**.

The Controller **guarantees a level of data security compliant with the degree of risk, including, inter alia, where applicable:**

- **pseudonymisation and encryption of personal data**
- ensuring the **continued confidentiality, integrity, availability and resilience of systems and services** used to process personal data (**operational and development security, intrusion protection and detection, prevention of unauthorized access**)
- in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner (data leakage prevention; vulnerability and incident management)
- a procedure for **regular testing, assessment and evaluation of the effectiveness of technical and organizational measures** taken to guarantee the security of data processing (maintaining business continuity, protection against malicious codes, secure storage, transmission, processing of data, security training)

In determining the appropriate level of security, explicit account shall be taken of the risks arising from the processing, in particular arising from the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored or otherwise handled.

9. PROCESSORS

Processor is a natural or legal person which processes personal data on behalf of the Controller. The following companies, persons act as processor (hereafter: Processor) regarding the Data Subject's personal data:

Processor's name and registered address	Processor's activities	Personal Data processed by Processor
Dr. Szerda Law Firm 1026 Budapest, Nyúl u 18., III/03.	Lawyer's tasks: any kind of legal process; contract drafting	Name, address, ID number, tax number, telephone number, e-mail address
Synology Inc., Grafenberger Allee 295, Düsseldorf 40237 Germany	Provision of digital backup storage regarding physical servers	Name, address, ID number, tax number, telephone number, e-mail address

The Processors are **entitled to process the above listed personal data** during the term of their engagement by the Controller, or if there is a respective contract during the period defined **in the table included into Point 12 herein.**

10. RIGHTS RELATED TO DATA PROCESSING AND ENFORCEMENT AND REMEDIES RELATED TO DATA PROCESSING

10.1. Rights related to data processing

The Data Subject may request the following from the Controller:

- information on processing of personal data (before commencement of and during processing),
- access to personal data (information on the personal data to be provided by the Controller),
- rectification of the personal data,
- erasure or restriction on processing of the personal data –except the mandatory data processing –,
- right to data portability,
- right to object regarding processing of personal data.

10.1.1. Information to be made available or given to the Data Subject, right of access by the Data Subject (based on GDPR Articles 13-14)

This Privacy Policy qualifies as provision of information with contents that is in accordance with Article 13 of the GDPR 13.

The Data Subject is entitled to request in writing, further information from the Controller using the contact details defined in Section 10.2 herein, regarding the following

- which personal data is processed,

- on which legal basis,
- for which data processing purpose,
- from which source,
- for which period,
- whether a Processor is involved, and if yes, the Processor's name, address and its activity in connection the data processing,
- to the Controllers when, under what legislation, which access to her/his personal data was granted or to whom they transferred her/his personal data,
- the circumstances, effects and remedial action of a possible personal data breach.

The Controller will fulfil the Data Subject's request within a maximum of one month, by sending its response to the contact details (e-mail or mailing address) provided by the Data Subject.

10.1.2. Right of access by the Data Subject (based on GDPR Article 15)

The Data Subject shall have the right to obtain from the Controller confirmation as to whether or not Personal Data concerning him or her are being processed, and, where that is the case, access to the personal data.

The Controller shall make a copy of the personal data subject to data processing available to the Data Subject, provided that this does not conflict with other legal obstacles. If the Data Subject has submitted the request electronically, the information shall be provided in a widely used electronic format, unless otherwise requested by the Data Subject.

10.1.3. Right to rectification (based on GDPR Article 16)

The Data Subject, using the contact details defined in Section 10.2. herein, is entitled to request in writing, that the Controller changes any of her/his personal data (e.g. you may change your e-mail address or postal contact information at any time, or request that the Controller correct any inaccurate personal data processed by the Controller). Taking into account the purposes of the processing, the Data Subject is entitled to request the appropriate rectification of inaccurate personal data processed by the Controller.

The Controller will fulfil the Data Subject's request within a maximum of one month, by sending its response to the contact details (e-mail or mailing address) provided by the Data Subject.

10.1.4. Right to erasure ('right to be forgotten') (based on GDPR Article 17)

The Data Subject, using the contact details defined in Section 10.2. herein, is entitled to request in writing the erasure of her/his personal data from the Controller.

Erasure of personal data can basically be requested if the Controller's processing **is based on the consent** of the Data Subject, in which case the Controller will **erase** the personal data.

The Controller will fulfil the Data Subject's request within a maximum of one month, by sending its response to the contact details (e-mail or mailing address) provided by the Data Subject.

10.1.5. Right to restriction of processing (based on GDPR Article 18)

The Data Subject, using the contact details defined in Section 10.2. herein, is entitled to request in writing, restriction of processing of her/his personal data from the Controller (by clearly indicating the limited nature of data processing and ensuring separate processing from other data). The blocking lasts as long it is necessary based on the reason indicated by the Data Subject for the necessity of the storage of the data.

The Data Subject may request the blocking ('sealing') of the data, for example, if (s)he believes that the data has been processed unlawfully by the Controller, but it is necessary for the purposes of a supervisory authority or court proceedings initiated by the Data Subject, that the Controller does not to delete the data.

In this case, until the request of the authority or the court, the Controller will continue to store the personal data, and after that it will erase the data.

10.1.6. Right to data portability (based on GDPR Article 20)

The Data Subject, using the contact details defined in Section 10.2. herein, is entitled to request in writing from the Controller, to receive the personal data concerning her/him, which (s)he has provided to the 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 based on **consent** pursuant to point (a) of Article 6(1) or point (a) of Article 9(2), or
- the processing is based on a **contract** pursuant to point (b) of Article 6(1); and
- the processing is carried out by **automated** means.

10.1.7 . Right to object (based on GDPR Article 21)

The Data Subject, using the contact details defined in Section 10.2. herein, is entitled to object in writing, against processing of her/his personal data based on point (f) of Article 6(1) necessary for the purposes of the **legitimate interests** pursued by the Controller or by a third party. The Controller 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.

10.2. Enforcement of rights and legal remedies related to data processing

Contacting the Controller

If you have any questions, doubts or requests for information about your data processed by the Controller or its Processor, you can **contact the data protection representative of the Controller**:

Data Protection Representative of the Controller: Róbert Magyar
Contact details of the Controller in connection with data protection:
mailing address: 2220 Vecsés, Vágóhíd u. 19, Hungary
e-mail address: dpo@equip-test.com

The Controller will, without unnecessary delay, within the time required by the applicable law, investigate the matter, take action on the request and provide information to the Data Subject in the event of enforcing a data processing right pursuant to Point 10.1, request of information related to data processing, or objection to processing, or submission of a complaint by the Data Subject. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended as provided by law.

If the Data Subject has submitted the request electronically, the information shall, if possible, be provided to her/him electronically, unless the Data Subject requests otherwise. If the Controller fails to take action on the basis of the Data Subject's request without delay, but no later than within the time limit specified by law, it shall inform the Data Subject of the reasons for non-action, refusal to fulfil the request, and on the fact that the Data Subject is entitled to initiate on her/his matter a court or supervisory authority proceeding.

Initiation of Court Proceeding

The Data Subject may initiate a court proceeding against the Controller or, in connection with data processing operations within the scope of the Processor's activities, against the Processor, if, in her/his opinion, the Controller or the Processor processes her/his data in breach of the applicable law or mandatory rules of the EU. This process **falls within the jurisdiction of the tribunal**. The court proceeding may be initiated **before the competent tribunal of the Data Subject's place of residence or place of habitually stay**, at the choice of the Data Subject. The Controller shall indemnify for the damage caused by the unlawful processing of the Data Subject's data or the violation of the data security requirements, however, it shall be released from liability if the damage was caused by an unavoidable cause outside the scope of data processing. The Controller will not indemnify for the damage to the extent that it resulted from the intentional or grossly negligent conduct of the Data Subject.

Initiation of procedure with the Supervisory Authority

With the Hungarian National Data Protection and Freedom of Information Authority:

President: dr. Péterfalvi Attila

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

Tel.: +36-1-391-1400

Fax: +36-1-391-1410

Mailing address: 1374 Budapest, Pf. 603., Hungary

E-mail: ugyfelszolgalat@naih.hu

www.naih.hu

the Data Subject is entitled to request an inquiry or to initiate a administrative procedure for data protection, in order to enforce her/his rights, on the grounds that there was or is an imminent risk of an infringement of the processing of her/his personal data, in particular:

- if, in her/his opinion, the Controller limits the exercise of her/his rights elaborated under Article 10.1., or rejects her/his request made with intention to exercise these rights (request an inquiry), and
- if, in her/his opinion, in processing of her/his personal data, the Controller or the Processor, entrusted by or acting on the Controller's behalf, violates the provisions on the processing of personal data defined in the applicable law or in the mandatory rules of the EU (initiation of administrative procedure for data protection).

11. OTHER

- Automated decision-making, profiling and the transfer of personal data to a third country or international organization will not take place** during the processing of personal data detailed in this Privacy Policy.
- This Privacy Policy is available at the following website: a <https://www.equip-test.com/>
- The Controller **reserves the right to unilaterally amend this Privacy Policy for the future. The Data Subject will be informed about the changes via** the Controller's website (a <https://www.equip-test.com/>)
- In addition to this Privacy Policy, the following documents may contain additional specific information, as the case may be:
 - „A” SPECIAL PURPOSES PRIVACY POLICY - for the Data Subject who contacts us in person (will be shared with the Data Subject who makes a personal visit to the registered office, branch office of a member of the Equip-Test Company Group)
 - „B” GENERAL PRIVACY POLICY RULES
 - „C” CAMERA POLICY - for the Data Subject who contacts us in person (will be shared with the Data Subject who makes a personal visit to the registered office, branch office of a member of the Equip-Test Company Group)

12. DETAILED DESCRIPTION OF DATA PROCESSING

Purpose of data processing	Categories of processed data	Period of data processing	Legal basis of data processing	Source of data	Recipient	Purpose of disclosure (if there is a recipient)
quoting, requesting quotations, responding inquiries	Identification data given by You	12 months (in lack of data processing based on other consent or contract)	Preparation of a contract	Directly from Data Subject	Equip-Test: persons participating in processing matters (e.g. customer service, contact keepers with the suppliers, keepers of administrative records), management Law Firm	Data processor - processing the Controller's legal matters - providing digital backup storage
fulfilling and invoicing sales and supplier contracts (product purchase, product sales, warranty and guarantee enforcement)purchase of products, warranties)	Name, address, ID number, tax number, telephone number, e-mail address	Warranty term, and term available for exercise of claims related to defected performance; in case of accounting document, the term defined by the statutory law as mandatory for keeping accounting documents	Performance of a contract	Directly from Data Subject	Equip-Test: persons participating in processing matters (e.g. customer service, contact keepers with the suppliers, keepers of administrative records), management Law Firm	Data processor - processing the Controller's legal matters - providing digital backup storage
complaint handling	Name, address, telephone number, e-mail address	Limitation period for claims arising from complaints	Performance of a contract	Directly from Data Subject	Equip-Test: persons participating in processing matters (e.g. customer service, contact keepers with the suppliers, keepers of administrative records), management Law Firm	Data processor - processing the Controller's legal matters - providing digital backup storage
factory data certification	Name, address, telephone number, e-mail address, tax number	10 years	Performance of a contract	Directly from Data Subject	Equip-Test: persons participating in processing matters (e.g. customer service, contact keepers with the suppliers, keepers of administrative records), management Law Firm	Data processor - processing the Controller's legal matters - providing digital backup storage
customer's feedback	Name, address, telephone number, e-mail address	12 months	Legitimate interest (GDPR Article 6 (1) f))	Directly from Data Subject	Equip-Test: persons participating in processing matters (e.g. customer service, contact keepers with the suppliers, keepers of administrative records), management Law Firm	Data processor - processing the Controller's legal matters - providing digital backup storage
non-contractual damages	Name, address, telephone number, e-mail address	The time required for the enforcement of the claim or the limitation period of the claim, or a maximum of five years from the knowledge of the event of damage, whichever is longer	Legitimate interest (GDPR Article 6 (1) f))	Directly from Data Subject	Equip-Test: persons participating in processing matters (e.g. customer service, contact keepers with the suppliers, keepers of administrative records), management Law Firm	Data processor - processing the Controller's legal matters - providing digital backup storage

Dated: 1st December 2020