

DATA MANAGEMENT INFORMATION
CONCERNING TO
DATA TREATMENT OF LEGAL PERSON'S PARTNER CONTACTS AND REPRESENTATIVES

1.1 DATA MANAGEMENT AND ITS AVAILABILITIES:

Name of the data managing company: Jász-Plasztik Kft. (hereinafter referred to as "Data Controller")
 Headquarter: 5100 Jászberény, Neicső telep 1.
 E-mail address: jasz-plasztik@jp.hu
 Telephone number: 06-57-413-413
 Website: www.jp.hu

1.2 DATA PROTECTION OFFICER AND RESPONSIBLE FOR DATA PROTECTION

Details of data protection officer of Data Controller are as follows:
 Name: Gulyásné dr. Kovács Adrienn
 Postal address: 5100 Jászberény, Neicső telep 1.
 E-mail address: gdpr@jp.hu
 Telephone number: 06-57-413-413/1122

1.3 SCOPE OF PROCESSED DATA, PURPOSE OF DATA PROCESSING, ITS LEGAL BASIS AND TIME OF DATA RETENTION

A) Personal data of contact persons / agents processed in connection with a contract entered into ("Contract") or established with a legal entity partner ("Partner") for the purchase of a product, goods.

| Scope of managed data | Purpose of data management | Legal basis of data management | Retention time |
|--|---|--|--|
| The legal status of the contract, as well as data required for the provision of any related services | Contractual relationship and establishing and fulfilling a legal relationship for the provision of other related services | Legitimate interest of the Data Controller and its Partner in the preparation or performance of the contract between them | 5 years from the contractual relationship with the Partner |
| Contact information | Notice regarding to the acquisition done by the Data Controller | The legitimate interest of the Data Controller and its Partner in connection with the performance of the contract between them | 5 years from the contractual relationship with the Partner |

B) Personal data of contact persons/ agents processed in connection with a contract entered into („Contract”) or established with a legal entity partner („Partner”) for the sale of a product, goods.

| Scope of managed data | Purpose of data management | Legal basis of data management | Retention time |
|--|---|---|--|
| The legal status of the contract, as well as data required for the provision of any related services | Contractual relationship and establishing and fulfilling a legal relationship for the provision of other related services | Legitimate interest of the Data Controller and its Partner in the preparation or performance of the contract between them | 5 years from the contractual relationship with the Partner |

| Scope of managed data | Purpose of data management | Legal basis of data management | Retention time |
|-----------------------|--|--|--|
| Contact information | Notice regarding to the sale done by the Data Controller | The legitimate interest of the Data Controller and its Partner in connection with the performance of the contract between them | 5 years from the contractual relationship with the Partner |

1.4 RECIPIENTS OF PERSONAL DATA, CATEGORIES OF ADDRESSEES

Data will not be transmitted to data processors and/or other recipients.

The Data Controller will not transfer the data of the Person concerned to a third country outside the European Union. The Data Controller will not transfer personal data to another person unless the transfer is mandatory by law, authority or court.

1.5 RIGHTS OF THE PERSON CONCERNED

The person concerned may request from the Data Controller access, rectification, erasure of personal data relating to him or her, and in certain cases may request a restriction on the processing of the data and may object to the processing of the personal data. The person concerned shall also have the right to lodge a complaint and to lodge a complaint with the supervisory authority and the right to legal remedy, and, in the case of automated decision-making in individual cases, the choice of the scope of the decision and the right to request human intervention. In the case of consent-based data processing, the data subject shall also have the right to withdraw the consent at any time, however, this does not affect the lawfulness of the processing of data on the basis of consent prior to revocation.

A) The right of access

The person concerned shall have the right at any time to request clarification as to whether and how personal data are processed by the Data Controller, including the purposes of data management, the recipients with whom their data have been communicated, or the source from which the data was received by the Controller, the retention period, any right to data management and information on automated decision making and profiling, and, in case of transfer to a third country or international organization, information on the relevant guarantees. In exercising his/her right of access, the person concerned shall also have the right to request a copy of the data, in the case of an electronic application – in the absence of a request from the contrary person concerned - the Data Controller will provide the requested information electronically (in pdf format). If the person concerned's right of access adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, the Data Controller shall have the right to deny the person concerned's request to the necessary and proportionate extent. In the event that the person concerned requests the above information in multiples, the Data Controller shall charge a reasonable fee proportional to the administrative cost of producing the additional copies, which shall be 200 HUF per copy/page.

B) The right to rectification

The Data Controller shall correct or supplement the personal data of the person concerned upon his/her request. In case of doubt regarding the rectified data, the Data Controller may call upon the person concerned to provide the Data Controller with appropriate proof, in particular by document, in an appropriate manner. If personal data covered by this right have been communicated by the Data Controller to another person (ie a recipient such as a data processor), the Data Controller shall inform these people immediately upon rectification of the data provided that this is not impossible or does not require a disproportionate effort from the Data Controller. At the request of the person concerned, the Data Controller shall inform him/her about these recipients.

C) The Right to erasure ("the right to effacing")

If the person concerned requests the deletion of some or all of their personal data, the Data Controller (s) shall delete them without undue delay, provided that:

- the Data Controller no longer needs the personal data for the purpose for which they were collected or otherwise processed;
- the processing is based on the person concerned's consent but the consent has been withdrawn and there is no other legal basis for the data processing;

- the data processing is based on a legitimate interest of the Data Controller or a third party but the person concerned has objected to the data processing, and - with the exception of any objection to data processing for direct marketing purposes - there is no priority legitimate reason for data management;
- personal data have been unlawfully processed by the Data Controller, or
- deletion of personal data is required to fulfill a legal obligation.

If personal data covered by this right have been communicated by the Data Controller to another person (ie. a recipient such as a data processor) the Controller shall inform these persons immediately upon deletion, provided that it is not impossible or does not require a disproportionate effort from the Data Controller. At the request of the person concerned, the Data Controller shall inform him/her about these recipients. The Data Controller is not always obliged to delete personal data, especially in that case, if data processing is necessary for the proposal, enforcement or defense of legal claims.

D) The right to the restriction of data management

The data subject may request the restriction of the processing of their personal data in the below cases:

- the data subject disputes the accuracy of the personal data – in this case the restriction applies to the period which allows the data controller to verify the accuracy of the personal data;
- if the data procession is unlawful, but the data subject objects against the deletion of the data and instead asks for their use to be restricted;
- the data controller no longer needs the personal information for the purpose of data management, but the data subject requires the data to submit, assert or defend legal claims; or;
- the data subject objected to the data management – in this case the restriction applies to the period until it is ascertained whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

The restriction of data management means that the personal data affected by the restriction shall not be handled by the Data Controller except for storage or only to the extent that the data subject has consented, or in the absence of such consent the data controller can still handle those data that are needed for submitting, asserting or defending legal claims, or for the protection of the rights of other legal or natural persons, or of an important public interest of the European Union, or some Member State of the Union. The data controller will inform the data subject in advance about the lifting of the restriction of the data management.

If the Data Controller has communicated the personal data covered by this right to another person (ie. to a recipient, such as a data processor), the Data Controller shall immediately inform such persons of the restriction, unless it is impossible or does not require a disproportionate effort from the Controller. At the request of the data subject, the Data Controller shall inform the data subject of these recipients.

E) The right to object

If the data processing of the data subject is based on a legitimate interest of the data controller or a third party, the data subject has the right to object to the data processing.

The data controller shall not be obliged to allow objection if the data controller can demonstrate that

- the data processing is justified by compelling legitimate reasons which prevail over the interests, rights and freedoms of the data subject, or
- the data processing is required for the filing, validation or defense of legal claims of the data controller's legal needs.

F) The right to data portability

The data subject shall have the right to request that the personal data they provided to the Data Controller by consent or on a contractual basis, and which the Data controller handles in an automated format (eg, computer system), is handed over to the data subject in a structured format, even for the purpose of transferring it to another data controller, or if it is technically feasible, transferring the data directly to another data controller designated by the request of the data subject. The data controller provides the requested data to the data subject in a pdf file. In case when the exercise of the data subject's right to data portability would adversely affect the rights and freedoms of

others, the data controller should have the right to deny the data subject's request to the extent necessary. Measures taken in the field of data portability do not imply the deletion of data, unless the data subject is simultaneously applying for the deletion of the data concerned; failing this, the data controller keeps the data as long as the data controller has the purpose and the appropriate legal basis for handling the data in question.

G) The right to complain, the right to legal remedy

If the data subject believes that the processing of personal data by the Data Controller violates the applicable data protection laws, in particular the General Data Protection Regulation, the data subject is entitled to file a complaint at the Hungarian National Authority for Data Protection and Freedom of Information, by the below contact details:

Web: <http://naih.hu/>

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Mailing address: 1530 Budapest, Pf.: 5.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

The data subject shall also have the right to file a complaint with a supervisory authority, in particular in the Member State in which he has his habitual residence, place of work or alleged infringement.

Irrespective of their right to complain, the person concerned may also go to court in the event of any such infringement. The competent authority in the case of the data controller is the Budapest-Capital Regional Court, however, the data subject may bring the lawsuit to the court of their residence. The list of the contact details of the Hungarian courts can be found in this link: <http://birosag.hu/torvenyszekek>. The data subject may also bring the case before the competent court of the Member State in which the data subject have their habitual residence in, if it is in another Member State of the European Union. The data subject shall also be entitled to apply to court against the legally binding decision of the supervisory authority. The data subject shall also have the right to a judicial remedy if the supervisory authority does not deal with the complaint or fails to inform the data subject within three months of the procedural developments or the outcome of the complaint.

The data subject shall have the right to entrust a non-profit organization or association formed in accordance with the laws of a Member State of the European Union, whose statutory purpose is to serve the public interest and to defend the rights and the freedom of data subjects with regard to personal data, in order to file a complaint on the data subject's behalf, to review the decision of the supervisory authority by judicial review, to bring the case before court and to assert the right to compensation of the data subject.

1.6 AUTOMATED DECISION-MAKING, PROFILE-MAKING

There is no automated decision making and profiling during the Data Manager's data management. * * *

Valid from: 05.11.2018