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Data Protection and Processing Policy

DATA PROTECTION AND PROCESSING POLICY

Teqtos Kft.

Regulation 2016/679 of the European Parliament and of the Council – „GDPR”

- Based on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

In force: from 25 May 2018

Approved by:

Tamás János KOSZTI general manager

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1. Preface

This policy ('Policy') lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. The Policy should apply to the specific processing activities and during issuing instructions and information regulating data processing.

Teqtos Kft (hereinafter 'Company' or 'Controller') does not employ data protection officer.

Name of the Controller: Teqtos Kft.

Headquarter of the Controller: Bank Center (CITI tower) 7th floor, 7. Szabadság square, Budapest, Hungary 1054

Contact of the Controller: info@teqtos.com

2. Scope of the Policy

The Policy is in force until revocation, its scope extends to the officers and employees of the Company, to its subcontractors, commissioners and processors.

3. Legislation serving as basis for processing

- 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, hereinafter: GDPR);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- Act XC of 2005 on the Freedom of Information by Electronic Means;
- Act C of 2000 on accounting;
- Act CL of 2017 on the Rules of Taxation;
- Act LXVI of 1995 on public records, public archives, and the protection of private archives;
- Recommendations of the Hungarian National Authority for Data Protection and Freedom of Information regarding data protection requirements of giving prior information.

4. Purpose of the Policy

The purpose of the Policy is to ensure the compliance with data protection legislation and the appropriate processing of personal data.

The Company wishes to fully comply with personal data processing legislation, especially the GDPR.

Furthermore, an important purpose of issuing the Policy, that by knowing it and adhering to it, the employees, subcontractors and commissioners of the Company will be able to lawfully process natural persons' data.

5. Definitions

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Commented [AD2]: <https://www.naih.hu/general-information.html>

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- controller: natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;
- personal data: any information relating to an identified or identifiable natural person ('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;
- third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the Controller or processor, are authorised to process personal data;
- data subject: any natural person who is defined, identified or is – directly or indirectly - identifiable by any personal data;
- consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

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- restriction of processing: the marking of stored personal data with the aim of limiting their processing in the future;
- profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

6. Legal bases for processing personal data

Processing shall be lawful only if at least one of the following applies (Article no. 6 of GDPR):

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes,
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- c) processing is necessary for compliance with a legal obligation to which the Controller is subject,
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person,
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller,
- f) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Based on the above, Processing should be lawful where it is necessary in the context of a contract or the intention to enter into a contract.

Where processing is carried out in accordance with a legal obligation to which the Controller is subject or where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, the processing should have a basis in Union or Member State law.

The processing of personal data should be regarded to be lawful where it is necessary to protect an interest which is essential for the life of the data subject or that of another natural person. Processing of personal data based on the vital interest of another natural person should in principle take place only where the processing cannot be manifestly based on another legal basis.

Some types of processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread or in situations of humanitarian emergencies, in particular in situations of natural and man-made disasters.

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The legitimate interests of a controller, including those of a controller to which the personal data may be disclosed, or of a third party, may provide a legal basis for processing. Such legitimate interest could exist for example where there is a relevant and appropriate relationship between the data subject and the Controller in situations such as where the data subject is a client or in the service of the Controller.

The processing of personal data strictly necessary for the purposes of preventing fraud also constitutes a legitimate interest of the data Controller concerned. The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest.

At any rate the existence of a legitimate interest would need careful assessment including whether a data subject can reasonably expect at the time and in the context of the collection of the personal data that processing for that purpose may take place. The interests and fundamental rights of the data subject could in particular override the interest of the data Controller where personal data are processed in circumstances where data subjects do not reasonably expect further processing.

The processing of personal data - to the extent strictly necessary and proportionate for the purposes of ensuring network and information security - by public authorities, by computer emergency response teams (CERTs), computer security incident response teams (CSIRTs), by providers of electronic communications networks and services and by providers of security technologies and services, constitutes a legitimate interest of the data Controller concerned.

The processing of personal data for purposes other than those for which the personal data were initially collected should be allowed only where the processing is compatible with the purposes for which the personal data were initially collected. In such a case, no legal basis separate from that which allowed the collection of the personal data is required.

7. Guidelines for data processing

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

Personal data shall be collected for specified, explicit and legitimate purposes.

The purpose of the processing of personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Personal data shall be accurate and kept up to date. Personal data that are inaccurate are erased without delay.

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

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The principles of data protection should apply to any information concerning an identified or identifiable natural person.

The employee of the Company who carries out data processing is liable to disciplinary, damage, non-compliance and criminal conviction measures. If the employee becomes aware that the personal data he or she is processing is faulty, incomplete, or untimely, he or she is obliged to rectify it or initiate the rectification at the colleague responsible for data recording.

8. Processing of personal data

As natural persons may be associated with online identifiers provided by their devices, applications, tools and protocols, in particular when combined with unique identifiers and other information received by the servers, may be used to create profiles of the natural persons and identify them.

Personal data should be processed in a manner that ensures appropriate security and confidentiality of the personal data, including for preventing unauthorised access to or use of personal data and the equipment used for the processing.

Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data.

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited, except if the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

Every reasonable step should be taken to ensure that personal data which are inaccurate are rectified or erased.

8.1. Data processing on the basis of the data subject's consent

In case of data processing on the basis of consent the data subject gives a written consent to process his or her personal data. There are no formal requirements for the consent, but paper- or electronic based written consent is necessary for posterior demonstrability.

Silence or inactivity should not constitute consent.

One consent means agreeing to process data for one data processing purpose.

If the Controller has more than one purpose for processing, a separate consent is needed from the data subject for each of the purposes.

It shall be as easy for the data subject to withdraw as to give consent.

Scope of the data processed: scope of data covered by the consent, purpose of processing: the purpose specified in the declaration of consent, period of processing: period specified in the consent or until withdrawal.

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Guaranteed rights of the data subject: communication, rectification, erasure, restriction, right for notification, data portability, objection, right for complaint, right for legal remedy.

The data subject shall be informed about the transfer of his or her personal data to the processor as well.

8.2. Data processing related to the performance of a contract

According to the GDPR, processing of personal data is also possible if processing is necessary for the performance of a contract to which the data subject is party or data processing, recording is necessary in order to take steps at the request of the data subject prior to entering into a contract.

8.2.1. Processing of data related to private persons as clients, partners and employees

The Controller can process personal data on the legal bases of entering into a contract, performing a contract and termination of a contract.

Based on data minimisation only the most necessary data are processed of the natural person in each case, especially the followings: name, mother's name, date and place of birth, address, phone number, e-mail address, bank account number, tax identification number, social security number (TAJ number). All data processing information related to employees can be found in Appendix no. 1.

Data processing based on this legal basis is lawful even if processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.

Recipients of personal data: employees and contributors of the Controller, who contribute to performing the contract, namely financial suppliers, product/service suppliers, persons performing transmitting, accounting and taxational activities and data processors.

Purpose of data processing: performing an order/assignment/contract, contact keeping with clients.

Period for which data is processed: according to Act C of 2000 on accounting, paragraph no. 169: 8 years. Labour documents according to Act LXVI of 1995 on public records, public archives, and the protection of private archives constitute documents of permanent value, so these documents and the personal data they contain cannot be scrapped.

Guaranteed rights of the data subjects: communication, rectification, erasure, restriction, right for notification, data portability, objection, right for complaint, right for legal remedy.

Data subject shall be informed prior to data processing, that the legal basis for data processing is the performance of the contract.

The data subject shall be informed about the transfer of his or her personal data to the processor as well.

8.2.2. Processing procurers', clients', partners' (companies, institutions) natural person representatives' and contact persons' contact data, who do not qualify as data subjects

Scope of the personal data concerned: name of the natural person, name of the represented company, his or her position, phone number, e-mail address.

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Purpose of processing of personal data: performance of contract concluded between the Controller and its non-natural person procurer, its client, its partner, and business contact keeping.

Legal basis for processing: performing a contract and/or consent of the data subject.

Recipients of data affected by processing and their categories: employees, contributors and data processors of the Controller, who are responsible for the performance of the contract and related contact keeping tasks.

Period for which data is processed: according to Act C of 2000 on accounting paragraph no. 167: 8 years.

Place and method of storage: in case of paper based data processing at the establishment of the company, in a paper file titled „Personnel documents” („Személyügyi anyagok” in Hungarian), electronically in Microsoft OneDrive system.

Guaranteed rights of the data subjects: communication, rectification, erasure, restriction, right for notification, objection, right for complaint, right for legal remedy.

Data subject shall be informed prior to data processing, that the legal basis for data processing is the performance of the contract or his or her consent.

The data subject shall be informed about the transfer of his or her personal data to the processor as well.

8.3. Processing for compliance with a legal obligation

8.3.1. General rules

Processing is carried out based on a legal obligation is independent from the consent of the data subject, as processing could have been determined by a legal act.

Independently from the obligatory nature of processing the subject shall be informed prior, that the processing is mandatory and cannot be circumvented, furthermore, the subject shall be informed unambiguously and detailed about all important facts related to processing of his or her data.

The communication shall cover: the purpose of data processing, name and contact details of the Controller and the data processor, the period of data processing, the compliance with a legal obligation as legal basis, and in case of transfers giving information about recipients, who can access and get to know the data.

The communication shall cover the subject's rights related to data processing and his or her possibilities for legal remedies. In case of obligatory data processing the communication can take place by disclosing the reference to the legal provisions mentioning the above information.

Guaranteed rights of the data subject: communication, rectification, right for notification, right for complaint, right for legal remedy.

If recording of personal data took place with the subject's consent, the Controller can process the recorded data without any additional consent and also after the withdrawal of the subject's consent Teqtos Kft.

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or objection - in absence of differing provision of GDPR, for the purpose of fulfilling the legal obligation relevant to the Controller.

Scope of processed data: data provided by law, purpose of data processing: purpose defined by law, period of data processing: period defined by law.

The data subject shall be informed about the transfer of his or her personal data to the processor as well.

8.3.2. Payer's data processing pursuant to tax legislations

The Controller processes the personal data of data subjects – employees, their family members, employed persons, other persons receiving allowance – described in tax laws with whom the Controller is in a legal relationship as payer (according to Act CL of 2017 on the rules of taxation paragraph no. 7 (31), hereinafter referred to as Art.) in order to perform various tax- and contribution obligations (tax-, pre-payment of tax, assessment of contributions, payroll, social security administration) described in tax- and social security laws.

The scope of the processed data is defined in Art. paragraph no. 50. These personal data are specifically: name, former name, sex, nationality, tax identification number of the natural person, social security number (TAJ number). All data processing information related to employees can be found in Appendix no. 1.

If tax legislations attach sanctions to this, the Controller can process the employees' health (Act CXVII of 1995 on Personal Income Tax, paragraph no. 40.) data in order to perform tax- and contribution obligations (payroll, social security administration) purposes.

Period for which the personal data will be stored: period defined in law describing the legal obligation.

Recipients of personal data: employees, contributors and data processors of the Controller, who perform tax- payroll- social security (payer) related activities.

Place and method of storage: in case of paper based data processing at the establishment of the Company, in a paper file titled „Personnel documents” („Személyügyi anyagok” in Hungarian), electronically in Microsoft OneDrive system.

8.4. Processing which does not require identification¹

If the purposes, based on which the Controller processes personal data, do not or do not any more make it necessary for the data subject to be identified by the Controller, the Controller is not obliged to store, acquire or process the complementary information to identify the subject only to comply with GDPR.

9. Informing the data subjects, their rights

¹ Detailed information: GDPR Article no. 11.

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9.1. Rights of information²

The principles of fair and transparent processing require that the data subject be informed comprehensibly of the facts and information related to data processing, especially prior to processing.

Where the personal data are collected from the data subject, the data subject should also be informed whether he or she is obliged to provide the personal data and of the consequences, if he or she does not provide such data.

The data subject can ask for information using the given contact details regarding which data, on which legal basis and for which data processing purpose from which source and for how long period is processed by the Company. Upon his or her request, immediately, but not later than 30 days, this information shall be sent to the given contact.

9.2. Right of access³

The data subject shall have the right to obtain from the controller a concise, comprehensible answer as to whether or not personal data concerning him or her are being processed, and, where that is the case, he or she has the right to access the personal data and information defined in GDPR.

9.3. Right to rectification⁴

The data subject shall have the right to have the Controller rectify inaccurate personal data concerning him or her. The data subject shall have the right to ask for amendment or extension of inaccurate, incomplete personal data. The request should be fulfilled without undue delay and at the latest within one month, and a communication should be sent to the data subject's given contact.

9.4. Right to erasure / „right to be forgotten“⁵

The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her - without undue delay – and a communication should be sent to the given contact, and the Controller shall have the obligation to erase personal data without undue delay in certain cases. This right of the data subject applies especially regarding the processing his or her personal data based on his or her consent, in certain other cases, among others, where processing is necessary for the compliance with a legal obligation this right of the data subject is expressly restricted.

9.5. Right to restriction of processing⁶

The data subject shall have the right to obtain from the Controller restriction of processing under specific conditions. These cases serve mainly to freeze a certain data processing status, which can be the antecedent of a disputed legal situation or might be the disputed situation itself.

² Detailed information: GDPR Articles no. 12-14.

³ Detailed information: GDPR Article no. 15.

⁴ Detailed information: GDPR Article no. 16.

⁵ Detailed information: GDPR Article no. 17.

⁶ Detailed information: GDPR Article no. 18.

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9.6. Notification obligation regarding rectification or erasure of personal data or restriction of processing⁷

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

9.7. Right to data portability⁸

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.

9.8. Right to object⁹

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, if

- the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, and,

- on grounds of the legitimate interests of the controller or a third party.

Where personal data are processed for the purposes of direct marketing, the data subject should have the right to object to such processing at any time.

9.9 Automated individual decision-making, including profiling¹⁰

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. In these cases the data subject can request human intervention and decision making.

9.10. Communication of a personal data breach to the data subject¹¹

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall communicate the personal data breach to the data subject without undue delay and inform him or her about the necessary details (nature of the data breach, consequences, etc.).

9.11. Right to lodge a complaint with a supervisory authority¹²

⁷ Detailed information: GDPR Article no. 19.

⁸ Detailed information: GDPR Article no. 20.

⁹ Detailed information: GDPR Article no. 21.

¹⁰ Detailed information: GDPR Article no. 22.

¹¹ Detailed information: GDPR Article no. 34.

¹² Detailed information: GDPR Article no. 77.

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The data subject shall have the right to lodge a complaint with a supervisory authority - in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement - if the data subject considers that the processing of personal data relating to him or her infringes the data protection regulation of the EU.

9.12. Right to an effective judicial remedy against a supervisory authority¹³

Each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them. This right applies even if the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

9.13. Right to an effective judicial remedy against a Controller or processor¹⁴

Each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with the EU regulation.

10. Review of personal data

In order to ensure that the personal data are not kept longer than necessary, time limits should be established by the Controller for erasure or for a periodic review.

Time limit for periodic review set by the head of the Company: 1 year.

11. Responsibility of the Controller

The Controller implements appropriate internal data protection policies for lawful processing. This policy extends to the competence and responsibility of the Controller.

The Controller should be obliged to implement appropriate and effective measures and be able to demonstrate the compliance of processing activities with the regulations in force.

This policy should take into account the nature, scope, context and purposes of the processing and the risk to the rights and freedoms of natural persons.

Taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, the Controller shall implement appropriate technical and organisational measures. It reviews and when necessary, updates other internal policies based on this Policy.

The Controller or processor should maintain records of processing activities under its responsibility. Each Controller and processor should be obliged to cooperate with the supervisory authority and make those records, on request, available to it, so that it might serve for monitoring those processing operations.

¹³ Detailed information: GDPR Article no. 78.

¹⁴ Detailed information: GDPR Article no. 79.

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12. Data security measures

The Controller implements appropriate technical and organisational measures for all processing activities to secure personal data, that guarantee the data subjects' rights beyond the legal and IT aspects.

The Controller, through its internal procedures and measures seeks to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

The Controller ensures appropriate physical and administrative protection of data and data mediums, documents, data, files, documents used for current work activity can be accessed only by the persons concerned by the task. Paper based documents containing employee-related, payroll and personnel-related and other personal data are kept locked in physically safe place.

Based on the Controller's personnel data protection policy, in order to protect personal data, it is in the Controller's right to control on a legal basis the flow of information entering and leaving by electronic means.

13. Possibility for enforcement of rights related to data processing

Hungarian National Authority for Data Protection and Freedom of Information

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E-mail: ugyfelszolgalat@naih.hu

URL: <https://naih.hu>

The data subject can appeal to the court against the Controller in case of breach of his or her rights. The court deals with the case by exception. The data subject can initiate the proceeding – upon choice – at the competent court by his or her place of residence as well.

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