

Data management guidelines

COMBIT Information Technology Private Limited Company

I.) General information about the aim of the data management guidelines

COMBIT Information Technology Private Limited Company (166 Hungária körút, Office #418, Budapest, 1146) (henceforth: COMBIT Ltd. or **Data manager**), as data manager, regards itself bound by the content of the present data management guidelines, and is responsible that all data management processes related to its services be in compliance with the present data management guidelines and current law. With its data management guidelines, COMBIT Ltd agrees to handle all personal data in accordance with current law, and takes all security, organizational, and technical measures to protect data.

The present data management guidelines contain the data management principles of COMBIT Ltd. The guidelines are in accordance with current data protection law, most importantly:

- Regulation 2016/679 (April 27, 2016) of the European Parliament and Council (EU) on the protection of natural persons related to personal data management and the free flow of such data, and the overruling of regulation 95/46/EK (general data protection regulations, henceforth: **GDPR**)
- Act CXII of 2011, on Informational Self-determination and Freedom of Information (henceforth: Infotv)

The present data protection guidelines are permanently accessible on the COMBIT Ltd homepage, at www.combit.hu. COMBIT Ltd preserves the right to unilaterally modify these guidelines. Any such modifications will be communicated in due time before the changes take effect to all concerned parties at their email address that we handle according to law, and on our website.

Should you have any questions related to our data protection guidelines, write to us at the contact information under the Contact option on the www.combit.hu website, or email us at combit@combit.hu, or contact us by phone.

II.) Data manager information:

Name of the company: COMBIT Information Technology Private Limited Company

Headquarters: 166 Hungária körút, Office# 418, Budapest, 1146

Corporate registration number: 01-10-046859

Phone: +361/789-3692

E-mail address: combit@combit.hu

III.) Cooperating data processors assigned by the data manager:

a) Accountant

Name of the company: SK AUDIT Llc.

Headquarters: 55 Csokonai utca, Dunaalmás, 2545

Office: 126-128 Bécsi út, C-107, Budapest, 1034

Corporate registration number: 11-09-12507

VAT number: 13957823-2-11

Representatives: Somogyi Csizmazia Éva, Somogyi Csizmazia György

Phone number: 36-21/2526-400

E-mail: audit@audit.hu

Website: www.audit.hu

IV.) Terms used in the guidelines

Personal data: any information concerning an identified or identifiable natural person (“data subject”); a natural person is identifiable if the person directly or indirectly can be identified especially through some identification, for example name, number, location identification data, online identification or through one or more factors concerning the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person;

Consent of the data subject: the voluntary, concrete, well-informed and unequivocal declaration of the data subject’s will, which signals the data subject’s consent to the management of her/his personal data through an announcement or an act that clearly expresses confirmation;

Objection: a declaration of the data subject, in which s/he protests against the management of her/his personal data and demands the cancellation of data management and/or the deletion of the managed data;

Data manager: the natural or legal person, organization with executive power, agency or any other organization that defines the purposes and means of personal data management by itself or together with others; if the purposes and means of data management are defined by EU or member state law, then the data manager or the specific criteria to assign the data manager can be defined by EU or member state law;

Data management: any automated or non-automated operation or the sum of operations performed on personal data or files, such as collection, recording, filing, partitioning, storing, conversion or modification, inquiry, introspection, usage, transmission of communication, dissemination or any other means of making accessible, synchronizing or linking, limiting, deletion, or destruction.

Data transfer: making data accessible to a specified third person;

Publication: making data accessible to anybody;

Deletion of data: making data unrecognizable in such a way that restoration of data is no longer possible;

Data processing: the completion of technical tasks related to the data management operations, regardless of the method and means used to perform the operations, and of the location of the usage, as long as the technical task is performed on the data;

Data processor: the natural or legal person, organization with executive power, agency or any other organization that manages personal data on behalf of the data manager;

Third party: the natural or legal person, organization with executive power, agency or any other organization that is not identical with the data subject, the data manager, the data processor or the persons who have been authorized to manage personal data under the direct control of the data manager or data processor.

V.) Our general data management principles

1. legality, fair treatment and transparency
2. purpose limitation
3. data minimization
4. precision
5. limited storage
6. integrity and privacy
7. accountability

The managed personal data have to meet the following requirements:

1. their recording and management is fair and legal;
2. they are precise, complete, and, if necessary, timely;
3. their storage method is such that the data subject can be identified only for the duration of the purpose of the storage.

Personal data can only be transferred, and different instances of data management joined if you specifically give consent, or the law makes it possible, and if all and every piece of personal data meets the above mentioned conditions of data management.

The court, the prosecutor and the investigative authority, or other legally authorized agencies can contact COMBIT Ltd for the purposes of providing information, communication and transfer of data, or making documents available. The exact purpose of data management and the scope of the required data must be specified in the inquiry. The inquiry may involve only

so many and such personal data that is absolutely necessary to achieve the purpose of the inquiry.

Data management connected to the services of COMBIT Ltd is either based on the unequivocal and voluntary consent of the data subject or on law. In case of consented data management, the consent can be withdrawn at any time.

The management of personal data is legal if it meets any of the conditions below:

1. the data subject has consented to the management of her/his personal data for one or more specific purposes;
2. data management is necessary to perform a contract where the data subject is a contractor, or when it is necessary in order to carry out the steps required by the data subject before the signing of the contract
3. data management is necessary to comply with the legal requirements towards the data manager;
4. data management is necessary to advocate the legitimate interests of the data manager or a third party, except when such interests or basic rights and freedoms of the data subject which require the protection of personal data take priority over these interests, especially when the data subject is a child.

We bring it to the data providers' attention that in case they are not providing their own personal data, it is the data provider's responsibility to secure the consent of the data subject.

VI.) The purpose, legal grounds, duration of personal data management related to specific instances of data management

6.1. Management of user/customer data

Scope of managed data: full name, phone number, e-mail address, billing name and address

Purpose of data management: The unequivocal identification of customers making use of COMBIT Ltd's IT services, the performance of services for those entitled

Legal grounds of data management: the completion of contractual responsibilities, the possible advocacy of the legitimate interest of the data manager.

The management of personal data used for invoicing serves to fulfill legal responsibilities and follows the regulations of the law on Accounting.

Duration of data management: we delete data from our system 5 years at the latest after the end of the contract between us. An exception to this is data used for invoicing purposes, which, according to accounting regulations, are to be preserved for 8 years after the issue of

the invoice. Thus, if the five years following the end of the contract falls before this time period, the deletion of data takes place after the time period of 8 years at the earliest.

6.2 Phone and e-mail data related to our services

Scope of managed data: full name, phone number and/or e-mail address (depending on the mode of contact)

With questions and problems related to the services of COMBIT Ltd, our customers and potential customers can reach us at the contact information provided under the Contact option on our homepage www.combit.hu, or at combit@combit.hu.

Personal data you provide on this surface will be managed in two ways, depending on whether

a) You are our customer already:

6.1. outlines the management of your personal data both in terms of its legal grounds and the purpose and duration of the management.

b) You are our potential customer or merely an interested person:

Scope of managed data: same as the previous

Purpose of data management: to provide precise, full answer to your inquiry

Legal grounds of data management: your unequivocal consent

Duration of data management: if you do not wish to become our customer after receiving our answer, we will immediately and automatically delete your data from our records. In case you become our customer, refer to 6.1.

6.3 Storage and security of personal data

The IT systems and other data storage spots of COMBIT Ltd are located in the separate server room maintained at its headquarters. The servers are protected by multiple firewalls, and are operated by our colleague assigned to this task.

When choosing, procuring, and operating its IT tools, COMBIT Ltd considers and ensures that the managed personal data are accessible only to those authorized, and their origin is verifiable and authentic.

COMBIT Ltd implements technical, IT, organizational and within-organizational measures to maintain the security of data management and to provide suitable protection levels related to the risks of data management.

COMBIT Ltd will do all in its power against computer-assisted fraud, espionage, sabotage, vandalism, blaze and deluge, and against computer viruses, theft, and denial-of-service attacks. Moreover, COMBIT Ltd implements server-level and application-level protective measures to ensure security.

COMBIT Ltd informs users that regardless of protocol (e-mail, web, ftp, etc.), electronic messages sent via the internet are vulnerable to network threats that lead to foul actions, contract contestation, or the disclosure or modification of information. COMBIT Ltd performs all and every possible security measure in its power to guard against such threats. It monitors the systems in order to record all security discrepancies and to secure evidence.

VII.) Options for legal redress

7.1 Do not hesitate to contact us!

According to relevant law, you have the following options to advocate for your rights related to personal data.

1. *Right to require information:* At the provided contacts you can require information about the type of data we manage, the legal grounds, the purpose of data management, its source and duration. Immediately upon your request, but within 30 days at most we will send the information to the e-mail address you have provided.
2. *Right to correction:* At the provided contacts, you can ask us to modify your data. We will act upon your request immediately but within 30 days at most, and we will inform you about the completed action at the e-mail address you have provided.
3. *Right to deletion:* At the provided contacts, you can ask us to delete your data. We will act upon your request immediately but within 30 days at most, and we will inform you at the e-mail address you have provided. For your information, data managed as part of the Data manager's obligation, and data necessary to fulfill the contract cannot be deleted until the contract is in effect.
4. *Right to blocking:* At the provided contacts, you can ask us to block your data. Blocking lasts until the reason you provide renders data storage necessary. We will act upon your request immediately but within 30 days at most, and we will inform you at the e-mail address you have provided.

5. *Right to protest:* At the provided contacts, you can protest against data management. Upon filing, your protest will be addressed as soon as possible but within 15 days at most, we will make a decision regarding its validity, and we will inform you about the decision in an e-mail.

In case you experience data management you believe to be illegal, contact our company so as to facilitate the expedite restoration of legal status. For your benefit, we will do everything to redress the problem.

7.2 Hungarian National Authority for Data Protection and Freedom of Information

Anyone can file a request of investigation with the Authority, citing that an abuse of right related to the management of personal data has taken place or a direct risk of it exists.

Contact information of the Authority:

Headquarters: 22/c Szilágyi Erzsébet fasor, Budapest, 1125

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Homepage: www.naih.hu

7.3 Legal enforcement of rights

In case of an infringement of rights, the concerned person can file a legal appeal against COMBIT Ltd. The court will give expedite status to the case.

The lawsuit falls under the authority of the Metropolitan Court of Budapest, but the concerned person may appeal to the authorized and competent court at their place of residence.

Issues not outlined in detail in the present guidelines are to be addressed according to the regulations of Infotv and GDPR.

May 25, 2018, Budapest