

Privacy Policy in relation to online data management

Data Controller Matro Kft. (headquarters: 7631 Pécs, Nagyárpádi út 7., company registration number: 02-09-061052, tax number: 10682825-2-02, e-mail address: info@matro.hu, phone number: 0672-548-110 , represented by: Managing Director Zoltán Kleisz, hereinafter: Data Controller) hereby informs you about the following data management and other facts online (on its websites, social media pages):

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The common characteristics of data management are the following:

- You, as a data subject, with your rights (right to access, right to rectification, right to erasure and right to be “forgotten”, right to block/restrict data, right to object, right to data portability, right to withdraw consent, see rights detailed descriptions at the end of the information) you can do this by sending a statement to any of the above contact details of the Data Controller, and you can also file a complaint with the authority (for contact information at any time, see: NAIH, ugyfelszolgalat@naih.hu; 1363 Bp., Pf. 9., www.naih.hu;), and if you believe that your rights have been violated, you can turn

to the competent court based on your place of residence. The Data Controller draws the attention of the data subjects that their exercise of rights may have conditions and limitations in relation to individual data management, which factors the Data Controller is obliged to examine in the case of data subjects exercising their rights. In the event that the data subject cannot exercise a right in connection with the given data processing, the Data Controller shall inform the data subject in writing (including the electronic method) of the factual and/or legal reasons that preclude/limit the exercise of the right and keep a record of this.

- The Data Controller ensures in particular:
 - on the denial of access by unauthorized persons to the devices used for data management (hereinafter: data management system),
 - on preventing unauthorized reading, copying, modification or removal of data carriers,
 - on preventing the unauthorized entry of personal data into the data management system, as well as the unauthorized access, modification or deletion of personal data stored therein,
 - on preventing the use of data management systems by unauthorized persons via data transmission equipment,
 - that persons authorized to use the data management system only have access to the personal data specified in the access permit,
 - about the fact that it can be checked and established to which recipient the personal data has been transmitted or may be transmitted, or has been or may be made available to them via data transmission equipment
 - about the fact that it can be subsequently checked and determined which personal data was entered into the data management system, at which time and by whom
 - on the prevention of unauthorized access, copying, modification or deletion of personal data during their transmission or during the transport of the data carrier
 - that the data management system can be restored in the event of a malfunction.
 - that the data management system is functional, that a report is prepared on errors occurring during its operation, and that the stored personal data cannot be changed even by operating the system incorrectly.

- **The data controller also carries out other, non-online data management, about which the affected person can find more detailed information in information sheets that are formally separate from this information sheet.**

Data management related to the data provided when filling out the website contact form

Purpose:	Facilitating and responding to contact on the website interface by the person concerned
Affected:	All natural persons who can be identified with the data provided on the website interface are identified

Source:	Affected persons		
Data	Purpose	Legal basis	Storage time
name*	identification, address	voluntary consent (GDPR Article 6 (1) point a)	until the goal is achieved, or sooner, until deletion or withdrawal of consent at the request of the data subject
e-mail address*	contact		
subject*	message subject		
message*	message, contact		
related technical data: date of submission*	later proof		
Comment:	<p>"If the contact on the website is made in connection with the fulfillment of an agreement that has already been established, the legal basis for data processing in the case of a partner of a natural person is the fulfillment of the agreement (GDPR Article 6 (1) point b), or in the case of processing the data of the representative or contact person of a non-natural person partner interest (GDPR Article 6 (1) f)).</p> <p>If the contact on the website can also be interpreted as a consumer complaint, the legal basis for data management is the fulfillment of a legal obligation (GDPR Article 6 (1) point c)). In that case, the storage period is 5 years based on the provisions of the law."</p>		
How is data managed?	<p>Activity and process involved in data management:</p> <ol style="list-style-type: none"> a. The data subject can enter the data specified above through a specific interface of the website and deliver them (by clicking) to the Data Controller. b. The provided data is sent to the server serving the website via an encrypted channel. c. The data controller processes the data and responds to contact. 		
Other	Regarding the data marked with *, the Data Controller draws attention to the fact that they are necessary for data management.		
Automated data management, profiling:	Not happening.		
Data transfer:	it is done when necessary for a legal representative, authority, or court.		

Data management related to data provided during contact on a any social site

Purpose:	Facilitating and responding to contact on the social media interface by the person concerned		
Additional information:	"This information sheet applies to data management on any social media site. The Data Controller is available at https://www.facebook.com/matrokft .		
Affected:	All natural persons who can be identified with the data provided on the interface of the social site are identified		
Source:	Affected persons		
Data	Purpose	Legal basis	Storage time
public name*	identification, address	voluntary consent (GDPR Article 6 (1) point a)	until the goal is achieved, or sooner, at the request of the data subject, until deletion or withdrawal of consent
public email address	contact if necessary		
public phone number			
subject	message subject (if available on the social network)		
message*	message, contact		
Other interaction according to social media (following, liking, etc.)	social networking feature		
related technical data: date of submission*	later proof		

<p>Comment:</p>	<p>Meta Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland), which operates facebook.com, is considered a joint data controller in connection with data management on facebook.com. Meta primarily manages page analysis data in connection with joint data management. The data controller designated for contact is Matro Kft.</p> <p>You can read the information about page analytics data created by Facebook here: https://www.facebook.com/legal/terms/information_about_page_insights_data</p> <p>More information about Meta's data management can be found here: https://www.facebook.com/privacy/center/</p> <p>The data protection settings on facebook.com can be changed here: https://www.facebook.com/settings?tab=privacy</p> <p>If the contact on the social media site is made in connection with the fulfillment of an agreement that has already been established, then in the case of a partner of a natural person, the legal basis for data processing is the fulfillment of the agreement (GDPR Article 6 (1) point b) or in the case of processing the data of the representative or contact person of a non-natural person partner interest (GDPR Article 6 (1) f)). In that case, the storage period is 5 years after the termination of the legal relationship (statutory statute of limitations).</p> <p>If contact on the social media site can be interpreted as a consumer complaint, the legal basis for data management is the fulfillment of a legal obligation (GDPR Article 6 (1) point c)). In that case, the storage period is 5 years based on the provisions of the law.</p>
<p>How is data managed?</p>	<p>Activity and process involved in data management:</p> <ol style="list-style-type: none"> a. The data subject can enter the data specified above through the specific interface of the social media site and deliver them (by clicking) to the Data Controller. b. The provided data is sent to the server serving the website via an encrypted channel. c. The data controller processes the data and responds to contact. <p>If the data subject uses other functions of the social media page, the Data Controller will be informed of the data controller's interaction with the Data Controller page (e.g. logging in), its time, and the data of the data subject made public.</p>
<p>Other</p>	<p>Regarding the data marked with *, the Data Controller draws attention to the fact that they are necessary for data management</p>

Automated data management, profiling:	It does not happen on the part of the data controller. It can be done by the operator of the social site, about which the operator of the social site can provide detailed information.
Data transfer:	it is done when necessary for a legal representative, authority, or court.

Data processing carried out by the data subject during contact by e-mail

Purpose:	enabling contact by e-mail on the part of the person concerned, replying		
Additional information:	All natural persons who can be identified with data provided by e-mail are identified		
Involved:	Affected persons		
Data	Purpose	Legal basis	Storage time
name*	identification, address	voluntary consent (GDPR Article 6 (1) point a)	until the goal is achieved, or sooner, until deletion or withdrawal of consent at the request of the data subject
e-mail address*	contact		
subject	message subject		
message*	message, contact		
related technical data: date of submission*	later proof		
Comment:	<p>If the e-mail contact is made in connection with the fulfillment of an agreement that has already been established, then in the case of a partner of a natural person, the legal basis for data processing is the fulfillment of the agreement (GDPR Article 6 (1) point b) or the processing of the data of the partner's representative or contact person who is not a natural person in case of legitimate interest (GDPR Article 6 (1) point f)). In that case, the storage period is 5 years after the termination of the legal relationship (statutory statute of limitations).</p> <p>If contacting by e-mail can also be interpreted as a consumer complaint, the legal basis for data processing is the fulfillment of a legal obligation (GDPR Article 6 (1) point c)). In that case, the storage period is 5 years based on the provisions of the law.</p>		

How is data managed?	Activity and process involved in data management: <ul style="list-style-type: none"> a. The data subject sends an e-mail to the e-mail address of the Data Controller. b. The e-mail will be received by the recipient, if he/she is not authorized to reply to the letter, it will be handed over to the authorized person according to internal rules. c. The data controller responds to the request.
Other:	Regarding the data marked with *, the Data Controller draws attention to the fact that they are necessary for data management
Automated data management, profiling:	Not happening.
Data transfer:	it is done when necessary for a legal representative, authority, or court.

Data management related to data provided during a request for a quote on a website or by e-mail

Purpose:	initiating a request for an offer on the part of the data subject and providing an offer on the part of the Data Controller		
Affected:	All natural persons who can be identified with the data provided during the request for proposals are identified		
Source:	Affected persons		
Data	Purpose	Legal basis	Storage time
name*	identification, address	Voluntary consent in the case of a natural person contracting entity (GDPR Article 6 (1) point a)	during the validity period of the offer, or sooner, until cancellation at the request of the data subject, withdrawal of consent or protest
e-mail address*	contact, e.g. for clarification purposes		
phone number*			
subject of offer	subject of the offer (if the person concerned specifies this separately)	In the case of a representative acting on behalf of a non-natural person, legitimate interest for contact purposes (GDPR Article 6 (1) point f)	
request*	sending a request for an offer, giving an offer		

related technical data: date of submission*	későbbi bizonyítás		
How is data managed?	<p>Activity and process involved in data management:</p> <ol style="list-style-type: none"> The data subject can enter the data specified above and send them (by clicking) to the Data Controller through a specific interface of the website, or request an offer by e-mail. The data controller processes the data, if necessary, contacts the data subject in order to clarify the offer and develops an offer and sends it to the data subject. 		
Other	Regarding the data marked with *, the Data Controller draws attention to the fact that they are necessary for data management		

Data management related to the data provided when applying for a job advertisement on the website of the Data Controller, a third party website, or via e-mail

Purpose:	enabling online application for a job advertisement, filling the advertised position		
Important information:	<p>The Data Controller always tries to find the most suitable candidate, regardless of the candidate's race and ethnicity, political orientation, religion or philosophical beliefs, trade union membership, health or sex life.</p> <p>Please do not send us a CV, cover letter or other attachment that contains data that falls under the above special category of personal data, or one or all of the following: photograph, interests, hobbies, other data that is not relevant to establishing an employment relationship, from the point of view of its fulfillment and termination.</p> <p>Furthermore, we ask that you do not share with us any trade secrets or company information related to your previous or current employment.</p>		
Affected:	All natural persons who can be identified with the data provided during the application for the job advertisement are identified		
Source:	Affected persons		
Data	Purpose	Legal basis	Storage time
name*	azonosítás, megszólítás	voluntary consent (GDPR Article 6 (1) point a)	until the position is filled (until the goal is achieved), or sooner, until deletion or withdrawal of consent at the
e-mail address*	kapcsolattartás		

given position or without a position, the fact of applying to the database*	filling a position or applying to the database		request of the data subject, in the case of application to the database within the deadline specified in the consent, if the data subject does not specify this separately, the Data Controller will process the data for a maximum of 2 years from the date of application.
relevant CV details*	evaluation, selection		
related technical data: date of submission*	later proof		
How is data managed?	<p>Activity and process involved in data management:</p> <ol style="list-style-type: none"> The data subject can enter the data specified above and send them (by clicking) to the Data Controller through a specific interface of the website, or request an offer by e-mail. The data subject can also apply for a job advertisement published online by the Data Controller and available on a website operated by a third party (e.g. via profession.hu). In such a case, the data management information of the given website must be applied accordingly. You can also send your resume and other data to the Data Controller by e-mail. The data controller processes the data and, in case of compliance, contacts the data subject and arranges an interview with him/her. 		
Other	Regarding the data marked with *, the Data Controller draws attention to the fact that they are necessary for data management.		

Who handles the data?

On the part of the Data Controller, only authorized employees are authorized to process the data.

The rights of the data subject

The relationship between the data subject's rights and legal grounds is presented in the following table, so that it is clear to the data subject what rights he/she can exercise in the case of the applied legal basis.

	Right to prior information	Right of access	Right to rectification	Right of erasure	Restriction	Data portability	Objection	Withdraw consent
Consent	✓	✓	✓	✓	✓	✓	✗	✓
Agreement	✓	✓	✓	✓	✓	✓	✗	✗

Legal obligation	✓	✓	✓	✗	✓	✗	✗	✗
Vital interest	✓	✓	✓	✓	✓	✗	✗	✗
Public duty, public authority right.	✓	✓	✓	✗	✓	✗	✓	✗
Legitimate interest	✓	✓	✓	✓	✓	✗	✓	✗

Right of access (Article 15 GDPR)

The data subject has the right to receive feedback from the Data Controller as to whether his personal data is being processed, and if such data processing is ongoing, he is entitled to receive access to personal data and information about the circumstances of data processing. If personal data is transferred to a third country or to an international organization, the data subject is entitled to receive information about the appropriate guarantees in accordance with Article 46 regarding the transfer. The Data Controller provides a copy of the personal data that is the subject of data management to the data subject if the data subject requests them.

Right to withdraw consent (Article 7 GDPR)

The data subject has the right to withdraw his consent at any time. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

Right to rectification (Article 16 GDPR)

The data subject has the right to request that the data controller correct inaccurate personal data relating to him/her without undue delay.

Right to object (Article 21 GDPR)

The data subject has the right to object to his personal data at any time for reasons related to his own situation, Article 6 (1) of the GDPR. against its processing based on points e) or f). In this case, the Data Controller may no longer process the personal data, unless it proves that the data processing is justified by legitimate reasons that take priority over the interests, rights and freedoms of the data subject.

Right to restriction of data processing (Article 18 GDPR)

The data subject has the right to have the Data Controller restrict data processing at his request, if any of the conditions specified in the GDPR are met, and in this case the Data Controller does not carry out any other operation with the data other than storage.

If the data subject objected to data processing; in this case, the restriction applies to the period until it is determined whether the Data Controller's legitimate reasons take precedence over the data subject's legitimate reasons.

Right to erasure (forgetfulness) (Article 17 GDPR)

The data subject has the right to have the Data Controller delete his personal data without undue delay, if there is no purpose for the data processing, he has withdrawn his consent and there is no other legal basis, in case of objection there is no overriding legal reason for the data processing, or if the data were processed unlawfully in the first place, and the data must be deleted to fulfill a legal obligation. If the Data Controller has disclosed the personal data

and is obliged to delete it, taking into account the available technology and the costs of implementation, it will take reasonably expected steps - including technical measures - in order to inform the data controllers handling the data that the data subject has requested from them the said deleting links to personal data or copies or duplicates of these personal data.

Right to data portability (Article 20 GDPR)

The data subject has the right to receive the personal data concerning him/her provided to the Data Controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without being hindered by the data controller whose provided the personal data if legal conditions (automated data management and legal basis for consent or agreement) exist.

Where and how can the data subject request detailed information on the management and transmission of data, as well as where and how can he/she exercise his rights?

The Data Controller draws the attention of the data subjects that the data subjects can exercise their request for information, access rights, and other rights by sending a statement to the Data Controller's postal or e-mail address. The Data Controller examines and responds to the declaration as soon as possible after receipt, and takes the necessary steps based on the provisions of the declaration, the Internal Data Protection Regulations and legislation.

The authority's contact information in case of a complaint (GDPR Article 77):

National Data Protection and Freedom of Information Authority

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

Mailing address: 1363 Budapest, Pf. 9.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

e-mail: ugyfelszolgalat@naih.hu

For more information about your rights and the details of the complaint to be submitted to the authority, visit the following website: <http://naih.hu/panaszuegyintezes-rendje.html>.

In the event of a violation of their rights, the person concerned can also apply to the court competent for their place of residence and, among other things, demand damages.

You can find the court responsible for your place of residence here: <https://birosag.hu/birosag-kereso>

It is possible that the services and functions of the website will change in the future, and the Data Controller may also modify the Data Management Information Sheet accordingly. Newer versions of the information are also published on the website. The above document was prepared for informational purposes. Date of the last revision of the contents: 08/10/2022.

Zoltán Kleisz
Executive Director
Matro Kft.