

## **GENERAL PERSONAL DATA PROTECTION INFORMATION**

As a data controller, **MultiContact Consulting Kft.** respects the privacy of all persons to whom personal data is transferred and is committed to the protection of their data.

## I.

### **Definitions**

To define the terms used in the present Regulation, definitions of Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information. (hereinafter: Infotv.), 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 the repeal of Regulation (EC) No 46 (General Data Protection Regulation, hereinafter "GDPR") apply.

## II.

### **Pursuant to Article 13 of the GDPR, MultiContact Consulting Kft. provides the following information to the relevant persons**

Data of the Data Controller:

#### **MultiContact Consulting Kft.**

Head office: 1115 Budapest, Bartók Béla út 105-113.

Telephone: +36 1 666 3750

E-mail: [adatvedelem@multicontact.eu](mailto:adatvedelem@multicontact.eu)

web site: [www.multicontact.eu](http://www.multicontact.eu)

#### **Data processor**

Damit Informatikai Kft. (6725 Szeged, Hópárduc utca 7. fszt. 3., [support@damit.hu](mailto:support@damit.hu))

Bartók Udvar 1. Kft. (Head office: 1115 Budapest, Bartók Béla út 105-113., Company registration number: 01-09-920264; tax number: 14796339-2-43)

The contract between the data controller and the data processor is set out in writing, which contains the data transferred by the data controller to the data processor and the activities of the data processor with them. The data processor handles personal data only on the basis of a written instruction from the data controller.

The data processor assists the data controller in fulfilling its obligations.

Upon termination of the provision of the data management service, the processor shall, at the discretion of the controller, return all personal data to the controller or delete existing copies, except where Member State or Union law requires the storage of the data.

The data processor shall facilitate and enable audits, on-site inspections by the controller or with the assistance of an inspector appointed by the controller, and shall provide the controller with all information necessary for the performance of these tasks and the fulfilment of data protection obligations.

#### **Data Protection Officer:**

MultiContact Consulting Kft. Is not obliged to appoint a data protection officer pursuant to Article 37 of the GDPR.

#### **Foreign data transfer:**

The personal data of partners and customers is not transferred abroad at present.

In order to guarantee data security, the data controller shall implement the necessary organizational and technical measures set out below.

#### **IT applications storing personal data**

- Active Directory service;
- Exchange server;
- Information system supporting internal operation;

- Project portal;
- Access Control System;
- Log files;
- Backup server;

### **Protection of personal data**

MultiContact Consulting Kft. operates an integrated management system according to MSZ EN ISO 9001:2015, MSZ ISO/IEC 27001:2014 and MSZ ISO 14001:2015 standards. With regard to information security it gives a high priority to the security of IT systems and data stored in them, as well as the management of all related processes, structured engineering and the management and control of security measures in particular the following areas: data leakage protection, border protection, data storage, backup, restore, document management, deletion, encryption, authorization management, incident management, physical protection, user awareness.

### **Cookie information**

As published on the website <http://multicontact.eu/hu/>.

### **III.**

#### **Purpose, legal basis, duration of data management of MultiContact Consulting Kft .:**

##### ***Data management purposes:***

Our company handles data in accordance with the law for the following purposes:

- contact - in connection with the provision of consulting activities, we treat the data of the users of the service as fulfilling a legal obligation and maintaining a customer relationship;
- in connection with the submission of an offer - the legitimate interest of the data controller: business continuity;
- concluding a contract - managing the data of contractual partners, contact data of contractual partners for the purpose of performing the contract;
- project implementation - fulfillment of customer orders - necessary for fulfillment of a contract;
- invoicing - fulfillment of a legal obligation;
- (f) selection - - see separate leaflet.

##### ***Legal basis for data management:***

Legal basis for each data management activity

(a) customer contact legal basis: Article 6 (1) (f) GDPR. The legitimate interest of the data controller: business continuity

- name;
- telephone number;
- e-mail address;
- the name of the employee visited;

(b) customer access - legal basis: Article 6 (1) (f) GDPR. The legitimate interest of the controller: business continuity

- name;
- date of entry and exit;

(c) tender - legal basis Article 6 (1) (f) GDPR. The legitimate interest of the controller: business continuity

- name;
- telephone number;
- e-mail address;
- education and training data;
- CV.

(d) conclusion of contracts, processing of data of contractual natural person partners: legal basis Article 6 (1) (b) GDPR

- name;
- address;
- e-mail address;
- telephone number;
- CV;
- portrait;
- signature.

(e) conclusion of contracts, processing of employee data of non-natural contractual partners: legal basis Article 6 (1) (f) GDPR

- in the legitimate interest of our contractual partners, to the extent and for the time necessary for the purpose, we take over and handle the following personal data of the employee of the contractual partner: name, e-mail address, telephone number;
- the legitimate interest of our contractual partner as a third party takes precedence over the exercise of the employee's right of disposal of personal data, as the above restriction is absolutely necessary for the conclusion of the contractual partner and is proportionate to the employee's job.

(f) project implementation GDPR Article 6 (1) (b): necessary for performance of the contract;

- name;
- telephone number;
- e-mail address;

(g) Article 6 (1) (c) of the GDPR, which is necessary to meet legal requirements for invoicing

- name;
- address;
- telephone number;
- e-mail address;
- tax number / tax identification mark;
- Social security number

h) data management - see separate information

i) Selection - see separate leaflet

#### ***Duration of data management:***

Retention period of data provided for contact purposes: if the document subject to data management contains an ancillary obligation or relates to a legal relationship which gives rise to any kind of obligation under the contract, for 1 year after the deadline specified therein or 1 year after the expiry of the ancillary obligation specified therein. For access data, 1 year after entry.

If the processing specified in points (a) to (h) fails for the reason(s) specified therein, the controller shall delete the data affected by the failure without delay.

Bidding, project implementation: 8 years after the termination of the contract.

Retention of data related to the performance of the contract: 8 years.

Invoices are kept for 8 years due to a legal obligation.

The retention period of the documents on which the invoice is based is 8 years.

#### **IV.**

##### **Rights concerned**

In relation to his/her personal data, the person in subject has the rights specified by law. The person in subject may request information on the handling of his/her personal data, as well as may request the correction of his/her personal data, or - with the exception of mandatory data processing -

deletion, revocation and may exercise his/her right to carry data and to protest at the above contact details of the data controller.

The rights of the person in subject are contained in detail in Chapter 6 of the Personal Data Protection and Data Management Regulation of MultiContact Consulting Kft.

#### **Privacy requests:**

If you wish to contact the data controller electronically, you can do so by e-mail to [adatvedelem@multicontact.eu](mailto:adatvedelem@multicontact.eu).

The controller shall, without undue delay, but in all the circumstances, within one month of receipt of the request, inform the person in subject, of the action taken on a request pursuant to Articles 15 to 22 of the GDPR. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The controller shall, within one month of receipt of the request, inform the person in subject, of the extension of the time limit, indicating the reasons for the delay. In the case of a request for personal data, we can fulfil the requests after proof of identity. If the person in subject, has submitted the request electronically, the information shall be provided by the controller electronically, unless the person in subject requests otherwise.

MultiContact Consulting Kft. provides the requested information free of charge. If the request of the person in subject is clearly unfounded or - especially due to its repetitive nature - excessive, MultiContact Consulting Kft. will charge a reasonable fee for providing the requested information or for the administrative costs of implementing the requested action, or may refuse to comply with the request.

## **V.**

### **Privacy incident**

**MultiContact Consulting Kft. ensures data security in accordance with the degree of risk related to data management<sup>1</sup>**, in the event of which it is damaged it will, without delay, but no later than within 72 hours upon becoming aware of the data protection incident of receipt, will notify the supervisory authority (NAIH) and inform the person in subject.

The data controller upon becoming aware of a data protection incident, shall immediately take the necessary security measures in order to eliminate or restore the damage that gave rise to the data protection incident.

If the data protection incident is likely to pose a high risk to the person in subject's rights and freedoms, we will notify the person in subject without undue delay of the data protection incident, the measures taken and their outcome, primarily by e-mail and if this is not possible, through any other contact information available to us.

## **VI. Remedies information**

In case of violation of the rights of the person in subject, he/she can turn against **MultiContact Consulting Kft.** to the following bodies:

In case of illegal personal data processing experienced by the person in subject, he/she may initiate a civil lawsuit against **MultiContact Consulting Kft.** The trial falls within the jurisdiction of the tribunal. The action may, at the option of the person concerned, also be brought before the court of his domicile.

Without prejudice to other administrative or judicial remedies concerned, the person in subject shall have the right to complain to the NAIH if he/she finds a breach of the processing of his/her personal data:

Data Protection Supervisory Authority: **Hungarian National Authority for Data Protection and Freedom of Information** (hereinafter: NAIH).

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<sup>1</sup> Data protection incident: a breach of data security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data processed.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C,  
Mailing address: 1530 Budapest, Pf.: 5.  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Telephone: +361-391-1400  
Fax: +361-391-1410

## **VII.**

### **Information on records**

MultiContact Consulting Kft. manages and processes personal data legally, transparently and verifiably and in order to achieve these goals it keeps the following records:

#### **1. Record of data processing**

Contents of the register:

- serial number;
- activity;
- managed data;
- purpose of data management;
- data management legal basis;
- method and time of storage;
- name and contact details of the data processor;
- technical and organizational measures;
- name and contact details of the data controller.

#### **2. Records of termination of data processing on request**

Contents of the register:

- serial number;
- date of application;
- name and identification of the person concerned;
- content of the application;
- name of the measure;
- date of action;
- name and contact details of the data controller.

#### **3. Register of data protection incidents**

Contents of the register:

- serial number;
- time of occurrence of the incident;
- name of the incident;
- the range of stakeholders;
- personal data involved;
- impact of the incident / likely consequences;
- description of measures and date taken;
- date of notification to the supervisory authority;
- name and contact details of the data controller.

#### **4. Record of stakeholder and authority requests and responses**

Contents of the register:

- serial number;
- subject and time of the request;
- stakeholders;
- personal data involved;
- provisions;
- name and contact details of the data controller.

#### **5. Register of “lost” data, inquiries**

Contents of the register:

- serial number
- arrival time
- subject of the application
- action (e.g. return)
- name and contact details of the data controller.

#### **6. Record of the preliminary data protection impact assessment**

Contents of the register:

- serial number
- time of impact assessment
- description of operations, purpose of data management, legitimate interest
- examination of necessity and proportionality
- risk analysis and management
- name and contact details of the data controller

#### **7. Record of data processing activity**

Contents of the register:

- serial number
- data controller data
- the content of the data processing agreement
- data about the sub-data processor
- description of data processing activity
- Fact of transfer to third country
- data security
- organizational measures

## Cookie information

MultiContact Consulting Kft. respects the confidentiality of the personal data of the persons visiting the website and handles them at all times in accordance with the applicable data protection legislation. When you visit the website of MultiContact Consulting Kft., you as well provide us with your personal data. Your personal data (i.e. data that can be linked to you) can be processed in two ways: on the one hand, with regard to maintaining an Internet connection, the technical data related to your computer, browser, internet address you use, the pages you visit are automatically generated in our computer system, on the other hand, you may provide your name, contact information or other details if you wish to contact us personally while using the website. If you want to ask a question or share your opinion with us, you can use the form on our contact page. In this case, you must provide your name, e-mail address, and your question or opinion. By filling in the form, those who fill in the form also agree that their data will be recorded and stored by MultiContact Consulting Kft. as a data controller. MultiContact Consulting Kft., as the Data Controller, does not transmit or disclose the provided data, but handles them secretly and only uses them for purposes closely related to the handling of the question you ask or opinion you express. You can request the deletion of personal data by sending an e-mail to [info@multicontact.eu](mailto:info@multicontact.eu).

## Cookies

Like most sites, this site uses cookies - small text files that are placed on your computer to help provide a better user experience on your website. Typically, cookies are used to store user settings, store data such as shopping carts, and provide **anonymized** tracking data to third-party applications such as Google Analytics. In general, cookies improve browsing experience, but you can disable them on this page and other pages as well of which the most effective way is to disable cookies in your browser. We recommend that you consult your browser's Help section or see the About Cookies website, which provides instructions for all modern browsers.

After writing a comment, the website will store the given name, e-mail and web address in cookies. Storage is for convenience only so that it does not have to be filled in automatically the next time you post. Cookies have an expiration date of 1 year.

If you have a user account and are also logged in to this website, we set temporary cookies in order to determine whether your browser accepts cookies. These cookies do not contain any personal information and are deleted as we close your browser.

When you log in to the website, we create several cookies that save your login information and display options for the editing surface. Login cookies are valid for two days, cookies that store the display options of the editing surface are valid for one year. If the "Remember me" option is checked, the login will continue for two weeks. When you log out, the login cookies will be removed. If you edit an entry or page, our browser will store another cookie. This cookie does not contain any personal information, it simply stores the ID number of the post we edited. It will expire in one day.

## What is the personal information we collect and for what purpose

### Comments

When you submit a comment, in addition to the information provided in the comment form, the IP address of the commenter and the browser ID string are collected to filter out unwanted content. A depersonalized string generated from the email address (commonly referred to as hash) is passed to the Gravatar service if it is used on the site. The terms and conditions of the Gravatar service can be viewed at <https://automattic.com/privacy/>. After accepting the post, the content of our post and our profile picture will also be public.

### Embedded content from other websites



Entries available on the Website may use embedded content (e.g., videos, images, articles, etc.) from an external source. Embedded content from an external source behaves exactly as if we had visited another website.

These sites may collect visitor data, use cookies or third-party tracking code, and monitor user behaviour related to embedded content if we have a user account and are logged in to the site.

### **Analytics**

We use Google Analytics traffic analysis on our site. Google Analytics Privacy Notice: [https://support.google.com/analytics/topic/2919631?hl=en&ref\\_topic=1008008](https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008)

### **How long we keep personal information**

If you post, the post and its metadata will remain in the system indefinitely. The purpose of this is to make all subsequent posts known and approved by us, i.e. not included in the list of posts to be moderated.

The personal data of users registered on the website (if any) will also be stored in their own user profile. All users can view, edit or delete their personal information at any time (except that they cannot change their own username). Website administrators can also view and edit this information.

### **What rights does the user have in relation to their own data**

When having an account or writing a post, an export file may be requested to be sent by the user containing any information previously provided to us. It may as well be requested that we delete any previously provided personal information. This does not apply to data that we are required to retain for administrative, legal or security reasons.

### **Where we send the data**

Posts submitted by visitors can be reviewed by an automatic spam filtering service.