

Privacy Notice

made for the customers of SUBAN Instruments Hungary Co.

During its operation as a data controller and data processor, our Company considers it to be particularly important to ensure the protection and safety of the data of its partners, contacted natural persons and other natural persons whose data are received (hereinafter collectively referred to as data subjects), as well to respect their rights as data subjects, and the possibilities of enforcing thereof. In light of the foregoing, for the purpose of and in order to comply with the effective Hungarian and European legal provisions, it shall provide the following brief information to all data subjects who are natural persons, and act on behalf of any customer of our Company, or who are natural person customers of our Company.

Who is the data controller?

With respect to this Notice, the data controller is SUBAN Instruments Hungary Co., registered under company registration number 09-10-000287 by the Tribunal Court of Debrecen as Court of Registration. The data controller's:

tax number: 11622453 -2-09

phone: +36 52 507-000

e-mail address: info@suban.hu

registered address: H-4032 Debrecen, Füredi út 98.

Who is the person responsible for data protection?

The person responsible for data protection at our Company is Krisztina Kormos, phone number: +36 52 507-000, mailing address: same as the registered address of the data controller.

Who are the data subjects?

A data subject is any specified natural person identified or identifiable directly or indirectly by personal data, whose data are controlled by the data controller.

With respect to our Company you may also be a data subject if you are our customer or the contact person of a legal entity customer.

How long are your data processed?

Answering this question depends on how you came into contact with us. During the data processing activities of our Company, the following of your data are processed:

I. One-time request for information

During any request for information, data processing is based on your consent. The data are provided by the data subjects at the time our Company is contacted. During the processing of your request, our Company may only request additional data if it is necessary to identify you more precisely in order to provide the requested information.

In the case of a one-time request for information you become a data subject if - in addition to providing your personal data - you also request information from our Company.

During any one-time request for information, the data controller processes the following personal information:

1.) The name you have specified; the purpose of processing these data is to identify you in order to provide you with the right information, and to communicate with you.
2.) The phone number and/or e-mail address you have provided; the purpose of processing these data is to communicate with you during providing information.
3.) The point of the question you have asked; the purpose of processing these data is to respond to your question.
4.) In case your question affects lawyers' professional secrecy or business secret, our Company examines whether you are entitled to access the information you have requested. In case such entitlement cannot be clearly determined based on the data in Section 1-3, our Company will request you to provide the following data for the purpose of determining your entitlement to the response: name at birth, place and date of birth, mother's name. The provision of extra data is also based on your consent, and in the case of any failure to submit such consent, during the data disclosure our Company shall issue a declaration stating that the data disclosure may not be performed, and it shall also record the legal basis of the refusal of data disclosure.

Our Company, as the data controller, will only process these data until the purpose has been fulfilled, i.e. the data will be erased as soon as your request is fully answered to your satisfaction; in case such erasure is not executed, the data will be erased at the time our Company issues its declaration on the denial of data disclosure, indicating the law properly substantiating the declaration.

The CEO of our Company, the assistant of the CEO, and the employee assigned to provide answer to the request are entitled to know the data.

II. Conclusion of a contract

We conclude oral or written contracts with our customers and with persons placing orders for our servicing operations.

When entering into a contract, you become a data subject if

- a) you are our customer or a person placing an order for our servicing operations as a private person or private entrepreneur,
- b) you are a senior officer of our legal entity customer (client), or
- c) you are a contact person assigned by our legal entity customer (client).

During concluding a contract, our Company processes the following data:

- a) in case you are the customer (client), as private entrepreneur or private individual: a. your name, name at birth, date and place of birth, mother's name, private entrepreneur registration number (if self-employed), tax number (if self-employed) and registered address (if self-employed), or address; the purpose of processing these data is to identify you as a contracting partner. In this case the data are provided by you in your oral or written declaration, or provide an authority certificate on being registered as a private entrepreneur. b. your signature; the purpose of processing this information is to certify the conclusion of the contract. The information is provided by you by signing the contract or the order form.
- b) in case you are the representative of our customer (client) as a natural person signing the contract:

- a. your name; the purpose of processing this information is to determine your right of representation. The information is obtained from the Company Register available free of charge, or on the basis of your declaration.
- b. your position; the purpose of processing this information is to determine your capacity of representing the Principal entering into contract with our Company. The information is obtained by query from the Company Register available free of charge, or on the basis of your declaration.
- c. your signature; the purpose of processing this information is to certify the conclusion of the contract. The information is provided by you by signing the contract.
- c) in case in the contract you are assigned by our customer (client) as the contact person:
 - a. your name; the purpose of processing this information is your personal identification and communication. The information is provided for us by our customer (client).
 - a. your phone number; the purpose of processing this information is your personal identification and communication. The information is provided for us by our customer (client).
 - c. e-mail address; the purpose of processing this information is ensuring communication with you. The information is provided for us by our customer (client).
- d) in some cases the ordered product or service may be so unique that the product, or the object of the service itself is suitable for identifying you; in such cases the description of the product or the object of the service is also processed as personal data, where the purpose of processing the data is to determine the framework of the contract.

Legal basis of the data processing:

- a) in case you are a contracting party, the legal basis of data processing shall be defined in Subsection b) of Section (1) of Article 6 of the GDPR, where data processing is necessary for the performance of a contract to which you, as the data subject, is a party.
- b) in case you are the representative of our customer (client) as a natural person, then with respect to Article 3:21 of the Civil Code, you act as a legal representative fulfilling legal obligations, and therefore, processing shall be lawful as defined in Subsection b) of Section (1) of Article 6 of the GDPR, where data processing is necessary for the performance of a contract where you are the legal representative of such party.
- c) in case you are a natural person designated by our contracting customer as a contact person, the legal basis of the data processing shall be the legitimate interest of the company that has assigned you as a contact person, where the result of the balance of interest test is as follows: "The rights of the data subject with respect to the confidentiality of their personal data (name, phone number, e-mail address) recorded in the contract is not compromised materially, or in ways affecting the life of the data subjects; when storing the data, the data controller acts following the appropriate security measures in accordance with the Privacy Policy, and based on the legitimate interest of the partner entering into contract with the Company."

When concluding a contract, exclusively the following persons or bodies shall be entitled to know your data:

- the CEO of our Company, employees involved in the performance of the contract,
- contributor specified in the contract,
- the legal representative of our Company reviewing the contract,
- the authority acting during the authority inspection, or any representative thereof.

Duration of data processing: our Company shall store the above data recorded in the contract to be concluded with you for 5 years after the completion or termination of the contract for any reason, except where there is a legal dispute arising from the contract. In such case, the duration of storage is 5 years after the final decision is issued on the legal dispute. The duration of storage is based on the general rules of statutory limitation specified in the Civil Code. After the expiry of the 5-year period, hardcopy data storage media will be destroyed using a P-3 security level paper shredder, or transferred for the purpose of destruction to any company engaged in document destruction, and any electronic data will be erased from the system by our Company.

The method of data erasure: Erasing documents or other data stored electronically in our data filing system, the destruction of hardcopy data storage media using a P-3 security level paper shredder.

III. Maintaining contacts

The purpose of maintaining contacts is the performance of the Contract.

With respect to maintaining contacts, you will become a data subject if you were assigned as the contact person in connection with the contract.

When concluding a contract, the data controller processes the following data:

- a) name; the purpose of processing this information is your personal identification and communication. The information is disclosed to us by you, or the customer (client) assigning you as the contact person. c) phone number, e-mail address; the purpose of processing these data to ensure communication with you. The data are provided for us by you, or the customer (client) assigning you as the contact person. c) on rare occasions we may process mailing address as contact address as well; the purpose of processing this information is to ensure communication with you. It is always you, who personally provides us the mailing address.

The legal basis of the data processing: the performance of the contract.

When maintaining contacts, exclusively the following persons or bodies shall be entitled to know your data:

- the CEO of our Company, employees involved in the performance of the contract,
- contributor specified in the contract.

Duration of the data processing: The day following the day when the contract is completed by both Parties.

IV. Request for quotations

During a request for a quotation, the data processing is based on your consent. The data are provided by you at the time you submit a request for quotation to our Company with respect to using any of our services.

During the request for a quotation, you will become a data subject when you request a quotation from our Company for any products distributed, or for any services offered by our Company, and during this process you provide your personal data.

During the request for a quotation, the data controller processes the following data:

1.) The name you have specified; the purpose of processing this information is to identify you in order to provide you with the right offer, and to communicate with you.
2.) The phone number and/or e-mail address you have specified; the purpose of processing these data is to communicate with you during the quoting process.
3.) The point of the question you have asked; the purpose of processing these data is responding to your question.
4.) Description of the service you intend to use, or the product you intend to buy; the purpose of processing this information is for us to appropriately choose the service or product with respect to which we offer our quotation.
5.) The completion date specified by you; the purpose of processing this information is to provide you with an offer based on your needs.
6.) Any special requests you indicated; the purpose of processing this information is also to provide you with an offer based on your needs.

Our Company, as the data controller, will only process these data until the expiry of the validity period of the quotation, that is, such data will be erased on the business day following the deadline included in the quotation we placed.

These data can be accessed by the CEO of our Company, and the employee involved in providing the quotation.

V. Submitting an order

During submitting an order, the data are provided by the data subject when the data subject initiates the order process either in person, by phone, or via an e-mail sent to our Company.

During an order you become a data subject when you provide your personal data for our Company.

During submitting an order, the data controller processes the following data:

description of data	purpose of data processing
Name	your identification
Contact phone number	contact
E-mail address	contact
Billing name	issue of the invoice (this data is only considered personal data if it includes your name)
Billing address	issue of the invoice (this data is only considered personal data if it includes your address or place of residence)
Description of the ordered product or service	performance of the contract
Number of ordered products	performance of the contract
Unit price and total purchase price of the ordered product	issue of the invoice

The legal basis of the data processing: conclusion and performance of a sale and purchase contract.

Duration of the data processing: 8 years from the date of the invoice issued in connection with the completed order. The order is handled together with the invoice.

Data transfer: no.

The data provided during the order may be accessed by our CEO and the employee responsible for performance.

VI. Order confirmation

The data required for the order confirmation are provided by you while submitting your order, at the time you initiate the order process.

During an order confirmation you become a data subject when you initiate a purchase at our Company as a private person, or when you, as a contact person for a legal entity, provide us with your contact data (phone number, e-mail address).

During order confirmation, the data controller processes the following data:

description of data	purpose of data processing
Name	your identification
Contact phone number	contact
E-mail address	contact
Billing name	issue of the invoice (this data is only considered personal data if it includes your name)
Billing address	issue of the invoice (this data is only considered personal data if it includes your address or place of residence)
Description of the ordered product or service	performance of the contract
Number of ordered products	performance of the contract
Unit price and total purchase price of the ordered product	issue of the invoice
Date of expected delivery	performance of the contract

The legal basis of the data processing: conclusion and performance of a sale and purchase contract.

Duration of the data processing: 8 years from the date of the invoice issued in connection with the order.

Your data provided during the order may be accessed by our employees involved in the performance of the order, and our CEO.

VII. Invoicing

Our Company performs its activity within the framework of Hungarian and EU laws; accordingly, we issue an invoice in connection with the sale of the product - the legal basis of issuing such invoice, as well as that of the processing of your data shall be Article 159 of Act CXXVII of 2077 on value added tax.

When invoicing, you become a data subject if the invoice is issued to your name or to the name of a company where the name of the company contains your name.

When invoicing, the data controller processes the following data:

Description of data	purpose of data processing
Billing name	issue of the invoice
Billing address	issue of the invoice
Description of the ordered product	issue of the invoice
Number of ordered products	issue of the invoice
Unit price and total purchase price of the ordered product	issue of the invoice
Tax number	Issue of the invoice (it can only be considered personal data if you are a private entrepreneur, or so-called VAT-registered private individual)

Our Company, as a data controller, will store these data for a storage period pursuant to the provisions of the Act on accounting, that is, for 8 years from the due date of the invoice.

The personal data included in the invoices will not be transferred.

The persons entitled to know the invoice data: the CEO of our Company, the employee issuing the invoice, the head of economy, the employee performing accounting at our Company, and the representative of the competent authority in the case of any authority inspection.

VIII. Handling of complaints

For the handling of complaints, you are the one to disclose data to us when you submit a complaint to us in association with the activity of our Company or any part thereof.

When handling complaints you become a data subject if you are the one submitting the complaint. When handling complaints you are the one disclosing data to us.

When handling complaints, the data controller processes the following data:

description of data	purpose of data processing
Name	your identification
Details of the complaint	resolving the complaint with a result that is satisfactory for both parties
Date of submitting the complaint	recording the complaint
Date of remedying the complaint	closing the complaint in the complaint records
Affected contract	identification of the case complained of

While handling complaints, in addition to the foregoing, we may process other data, as well, depending on the details of the complaint, e.g. in case your complaint was submitted regarding payment problems, then your previously provided bank account number may also be used in order to find the reasons of our omission.

Legal basis of the data processing: Fulfilling our obligation set out in Article 6:138 of the Civil Code, which states that in the any violation of a contract the aggrieved party shall be entitled to require the proper performance of services.

Duration of the data processing: 5 years after closing the complaint in the complaint records, pursuant to the general rules of statutory limitation specified in the Civil Code.

While handling of complaints, data transfer is performed in case the complaint cannot be remedied to your satisfaction by our Company, and administrative procedure or judicial action is initiated in this regard. In such an event, we hand over the data to the competent authority; the legal basis of such data transfer is the provision requiring proof contained in Act III of 1952 on the Code of Civil Procedure.

When handling of complaints, in addition to the CEO of our Company and the employees entitled to handle the complaint, our legal representative may also have access to the data processed by our Company, as well as the authority acting on the basis of your request - in case the complaint was not remedied to your satisfaction.

Are your data processed in any other ways?

Your data will exclusively be processed for the purposes specified above, and they will not be transferred to third persons unless such activity was specifically indicated in this Notice.

Cases of exception to the foregoing: if our Company is contacted by an investigating authority, court, prosecutor, authority investigating violations, administrative authority, or other authority under authorization by law. In such case, our Company shall only transfer your data in the scope and to the extent covered by the letter sent by the authority precisely indicating the purpose and the scope of data, and that are absolutely necessary for fulfilling the tasks of the authority.

In the case of a legal dispute arising out of the contract between our Company and you, the customer represented by you, or the customer assigning you, then the contract shall be transferred to the competent court or mediator to make a decision in the legal dispute. The purpose is the legitimate interest of our Company.

What are your rights?

4.1. Right of access

When this right is exercised, you may request access to your personal data. In this context, you may request information from us on the following: the categories of your data concerned, what the legal basis is, the purpose and duration of such data processing, how the data have been collected, the purpose, legal basis, date and recipient of any data transfer, and who has been given access to such data, when and on what legal grounds.

4.2. Right to rectification

When this right is exercised, you may request the rectification and correction of the above data in the case of discrepancies. In accordance with your request, our Company is obliged to correct the above data within 3 business days.

For example: If your mailing address, phone number, or e-mail address has changed, you may request the data controller to enter the new data in its records.

In the case of incomplete data you may have your data supplemented. In the course of any operation of data processing, however, data in addition to the ones described above are not necessary, and therefore such data would be processed without a specified purpose. In case you wish to provide a new phone number or e-mail address, and you do not want the previous ones to be erased, please indicate the primary contact of the two (former and new) data.

4.3. Right to erasure (right to be forgotten)

When this right is exercised, you may request the data controller to erase your data processed by the data controller on the basis of your consent unless no obligation to store such data until a specified period is required by the relevant legislation. In case your data were transferred to a third person by the data controller - and such transfer was not based on legal obligation - you may request the data controller to initiate having your data erased at the recipient.

For example, you may request the erasure of your email address or phone number from our records, however, as a result, we will not be able to fulfill the contract due to lack of communication, and the existing contract will be terminated due to causes attributable to you.

4.4. Right to restriction of processing (right to blocking)

In case you contest the accuracy of your personal data, you shall have the right to obtain from the controller restriction of data processing until the data controller checks the accuracy of such data, and corrects them if necessary.

You may also request the restriction of your data to certain purpose(s) if the data processing is unlawful but you do not want them to be erased. In this case your data may not be used for the purpose designated by you until you make a statement to the contrary.

For example, in case you provided your data to us for the purpose of concluding a contract, however, such contract has not been concluded, and in this way the purpose of data processing has not been implemented, the data processing may become unlawful on the date after the day the signing of the contract was planned for. However, in case you make a declaration that you do not wish your data to be erased, then they will remain on the records of the data controller, and therefore, in case you later contact our Company with the intention to conclude a contract, then it won't be necessary for us to record your data again, and checking

their accuracy will be sufficient. You may also request the restriction of the processing of your data in case the data controller no longer needs the personal data for data processing, but you decide to request the further processing of your data for the establishment, exercise or defense of legal claims. In this case, in addition to the restrictive declaration, please make a declaration on your consent to the further processing of your data. In case you think that the processing of your data violates your legitimate interests, you may restrict the processing of your data until it is determined whether the purpose of the data processing, or the legitimate grounds of the data processing override your legitimate interests. During the period of the restriction, the blocked personal data may only be stored by the data controller, or they may be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal entity or for reasons of important public interest. For example: in case the data controller may have any direct claims against you, the data controller shall be entitled to use your data for judicial means.

4.5. Right to object

You have the right to object - unless storage or processing of your data provided with your previous consent is required by legislation - on grounds relating to your particular situation, at any time to the processing of your personal data.

The data controller shall not be entitled to use personal data for direct marketing purposes. No profiling shall be performed by the data controller. The data controller shall not process data for scientific or historical research purposes, or for statistical purposes.

4.6 Right to lodge a complaint to a supervisory authority

In the case of complains with respect to the data controller's processing of your data you are entitled to turn to the Hungarian National Authority for Data Protection and Freedom of Information. Contact details of the Authority:

Mailing address : 1530 Budapest, Pf.: 5., Hungary
 : 1125 Budapest, Szilágyi Erzsébet fasor 22/C., Hungary
 Address +36 1 3911400
 s: ugyfelszolgalat@naih.hu
 Phone: <http://naih.hu>

E-mail: 4.7. Right to an effective judicial remedy

Web: In case you think that we have infringed your rights during the processing of your data, and you wish to lodge a complaint before court, you are entitled to turn to court. In addition, you may seek judicial remedy against the resolution of the data protection authority - pursuant to the general rules of administrative proceedings - by submitting a claim at the competent administrative and labor court.

In addition to the foregoing, you have the right to receive information, which is fulfilled by our Company by issuing this Notice.

Debrecen, 10 February 2019

SUBAN Instruments Hungary Co. Data Controller