

PRIVACY POLICY

- GENERAL INTEREST -

3.1. Processing personal data of interested parties

1. Before data processing it is needed to inform the data subject
2. Upon request it is necessary to provide the Privacy Policy to the data subject
3. Contract execution
4. If the data subject after contract execution objects to the data processing, it may lead to the termination of the contract

3.1. Processing personal data of interested parties

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council 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), we hereby inform you about the processing of personal data provided by you:

1. DATA CONTROLLER:

Name of data controller:	BONUS Kft.		
Address of data controller:	Ipartelepi út 2, H 7800 Siklós		
Contact details of data controller:	e-mail	privacy@bonus-hungary.com	
	telephone	+36 1 770 7005	
	website	https://www.bonus-hungary.com/	
Data collector officer (if available)	-		
Contact details of data collector officer (if available)	-		

2. DATA PROCESSED

Scope of data processing, purpose and legal basis of data processing

Personal data	Purpose of data processing	The legal basis for processing data
Contact data: Name Phone number E-mail address	Archiving contact information for later contacting	Legitimate interest - GDPR Article 6 paragraph 1 letter f)

Data processing (storage) period:

Until withdrawal of consent, but maximum for 1 year

Is data profiling done during data processing?

Answer	Options	A short, understandable description of profiling
Yes		
No	<input checked="" type="checkbox"/>	

Is automated decision making done during data processing?

Answer	Options	A short, understandable description of automation
Yes		
No	x	

If yes, the data subject has the right to request manual, human intervention.

Source of processed personal data:

Letters, notes of telephone inquiries, e-mails

The data will be transmitted:

Category	Company's name, registered office address, business activity
Data processors (performing technical tasks related to data processing)	Infocomplex Bt. Littke J. u. 21., H - 7632 Pécs, System administrator provider Microsoft Ireland Operations Ltd. One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521/Microsoft Corporation, 15010 NE 36th Street Microsoft Campus, Building 92, Redmond, WA 98052 Mail system and cloud based storage provider, MS Office365
Recipients	Dr. Tamás, Marosvári, Király u. 23-25., H - 7621, Pécs Legal activity
To third (non-EU) country	Microsoft Ireland Operations Ltd. One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521/Microsoft Corporation, 15010 NE 36th Street Microsoft Campus, Building 92 Microsoft Campus, Building 98052, Redmond, WA 98052 Mail system and cloud based storage provider, MS Office365

Joint data processing takes place:

Answer	Options	A short, understandable of joint data processing
Yes		
No	x	

Joint data controller's name	Registered office
Not relevant	

Data access and security measures:

Restriction of access	<p>Documentation containing personal data is handled with adequate security arrangements, and the right of access is limited.</p> <p>Documentation containing personal data is being stored during business processes in a structural system, separated from each other.</p> <p>Paper based documents are being stored in lockable offices and lockers. Document filing takes place annually.</p> <p>The central office has an alarm, fire alarm and camera system for property and personal security.</p> <p>The original version of both paper based and digital documents are stored, thus data duplication is kept to a minimum.</p>
Data security measures:	<p>During data processing a corporate e-mail system is being used.</p> <p>The cloud based MS One Drive is authentication and password-protected. Data is being transferred to controllers on this platform.</p> <p>A daily backup is performed on the data set of the file server, the corporate e-mail system and the MS One Drive.</p> <p>Personal data is stored in a structured system on the software used by the company, the corporate governance system and the company's file server.</p> <p>Centralized password management and authorization take place.</p>

3. THE RIGHTS OF THE DATA SUBJECT:

The data subject rights under legal basis and their clarification.

Right to information - The data subject shall have the right to be informed about the means and the purposes of processing of personal data before it occurs.

Right to rectification - The data subject shall have right to have personal data concerning their rectified, if the personal data stored by the data controller incorrect is.

Right of access - The data subject shall have right to obtain their stored personal data from the controller.

Right to object - If the legal basis is based on legal interest or on public authority, the data subject shall have right to object processing their personal data, but it does not mean immediate erasure of their data.

Right to restriction of processing - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.

Right to data portability - The data subject shall have right to request their personal data stored in digital tabular form.

The data subject rights under legal basis and their clarification.

Right to review automated decision making - the data subject shall have the right to request manual review of each data management process, where the controller applied such automated decision-making which has a legal effect on the data subject.

4. FILING A COMPLAINT

The data subject shall have the right to lodge a complaint with a supervisory authority.

You can appeal to the National Authority for Data Protection and Freedom of Information.

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Registered office	Szilágyi Erzsébet fasor 22/c., H - 1125 Budapest
Address	1530 Budapest, Pf.: 5.
E-mail	ugyfelszolgalat@naih.hu
Phone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
website	http://naih.hu

5. JUDICIAL REMEDY

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

Where the data subject objected to processing data, the data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request, make a decision on its validity and inform the applicant in writing of its decision. If the data subject does not agree with the controller's decision, or if the controller fails to meet the deadline specified above, the data subject shall be entitled to turn to court within 30 days from the announcement of the decision or the last day of the deadline.

In the event of a violation of their rights and in the above cases the data subject may take legal action against the data collector. The court will deal with the matter out of turn. The data subject may bring action before a court having jurisdiction over their place of residence or stay by their choice. A party who does not have procedural legal capacity may also be a party to the lawsuit. The Data Protection Authority may intervene in the action for the court success of the data subject.

If the data controller causes damage to the data subject by unlawful data processing or by violating data security requirements, they are obliged to compensate it. If the data controller violates the data subject's right to privacy by unlawfully processing the data subject's data or by violating data security requirements, the data subject may claim restitution from the data controller. The controller shall be liable to the data subject for the damage caused by the controller and the controller is obliged to pay restitution to the data subject in case of violation of personality rights. A controller shall be exempt from liability of the damage cause and from the restitution if they prove that the damage or the violation of the data subject's rights to privacy was caused by an unavoidable cause outside the scope of data processing. No damages shall be paid, and no restitution shall be claimed, if the damage was caused by the injured party or the infringement because of violation of personal rights was caused by the data subject's wilful misconduct or gross negligence.