

**GENERAL DATA PROCESSING NOTICE
ON THE RIGHTS OF NATURAL PERSONS
WITH REGARD TO THE PROCESSING OF THEIR PERSONAL DATA**

**IBOSOFT DEVELOPMENT
KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG**

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Introduction

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 repealing Directive 95/46/EC - General Data Protection Regulation - (hereinafter as Regulation) stipulates that the controller must put in place adequate measures so that every communication to the data subject regarding the processing of personal data is provided in a succinct, transparent, comprehensible and easily accessible format, in plain and clear language, furthermore, that controller fosters the exercise of rights by the data subject.

Act CXII of 2011 on Informational Self-Determination and the Freedom of Information also prescribes the obligation to inform the data subject in advance.

We fulfil our statutory obligation in this regard with our notice below, by defining some important concepts. Therefore

- a. **personal data:** means any information relating to an identified or identifiable natural person (hereinafter as “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- b. **data subject:** means a natural person that is or that can be or is identified based on any specific personal data or.
- c. **recipient:** means the natural or legal person, public authority, agency or other body to whom or to which the personal information is disclosed, regardless of whether it is a third person (the persons having access to the data);
- d. **controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of the personal data, makes and implements the decisions regarding the processing of the data (including the means applied) or ensures that they are implemented by processor.
- e. **processor:** means a natural or legal person, public authority, agency or other body which processes the personal data on behalf of the controller.
- f. **processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Unless specified otherwise in this Notice, processing includes the processing of the data as well.
- g. **processing:** means all the data processing operations of the processor performed on the basis the request or the instructions of the controller.

This notice is available at the website of our Company, and we will send it to you, the data subject, via electronic means upon request.

I. Name of Controller

1. Controller: based on Section 7 Article 4 of the Regulation means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of the personal data.
2. The issuer of this notice and the Controller (hereinafter: Company)

Name of company: IBOSOFT Development Kft.
Registered seat: H-1137 Budapest, Jászai Mari tér 5-6.
Telephone number: +49 15 227 555 605
E-mail address: hello@ibosoft.eu
Website: www.ibosoft.eu

II. Name of Processors

3. Processor: based on Section 8 Article 4 of the Regulation, a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
4. The engagement of a processor does not require your prior consent, but you shall be notified. Having regard to this, we inform you of the following:

Name of accounting service provider

5. For the fulfillment of its taxation and accounting obligations, our Company engages a data processor through an accounting services agreement in the framework of which - for the duration of that agreement - it also manages the personal data of natural persons who are in a contractual or payment-related relationship with our Company, in order to fulfil the taxation and accounting obligations of our Company by properly implementing the provisions included in Section 169 of Act CXXVII of 2017 on Value Added Tax and Section 167 of Act C of 2000 on Accounting.
6. This processor (hereinafter as Accountant):

Name of company: Adó-Faragó Team Kft.
Registered seat: H-1134 Budapest, Gidófalvy L. u. 33. III/4.
Telephone number: +36 1 239 7038
E-mail address: adofarago@adofarago.hu

Online invoice provider

7. Our Company fulfills its invoicing obligation by using an online invoicing software application, in the scope of which the company providing the Internet-based invoicing system processes the personal data of natural persons.

8. This processor (hereinafter as “online invoice provider”):

Name of company: KBOSS.hu Kft.
Registered seat: H-1031 Budapest, Záhony u. 7/c.
Telephone number: +36 30 354 4789
E-mail address: info@szamlazz.hu

Financial service provider

9. Our Company engages a financial institute for the processing of data in connection with account-related financial transactions carried out by bankcards, bank transfers or any other method of payment by natural persons in a contractual relationship with it as clients or suppliers, for the performance of contracts. The financial institute - for the duration of our agreement with it - shall carry out processing in connection with financial transactions.

10. This processor (hereinafter as Bank)

Name of company: Raiffeisen Bank Zrt.
Registered seat: H-1054 Budapest, Akadémia u. 6.
Telephone number: +36 1 484 8484
E-mail address: info@raiffeisen.hu

Postal services, deliveries, parcel delivery

11. Our Company uses the state postal service to send the deliveries to the data subjects. This contributor, subject to Section 54(1) of Act CLIX of 2012 on postal services, acts as a controller when carrying out this service, and in the course of this it receives from our Company the personal data required for the delivery to be made (name, delivery address, telephone number of the recipient) which it uses to perform the delivery.

12. This postal company (hereinafter as: “Post”)

Name of company: Magyar Posta Zrt.
Registered seat: H-1138 Budapest, Dunavirág u. 2-6.
Telephone number: +36 1 767 8282
E-mail address: ugyfelszolgalat@posta.hu

III. The data processing activity of the Company

Processing the data of employees applying for work, tenders, curriculum vitae

13. Our Company processes the personal data of the natural persons applying for work based on the submitted CVs and other documents, for the purpose of assessing the suitability for the particular position, based on the consent of the data subject.

14. We process the personal data based on the following: name, place and date of birth of the natural person, mother’s maiden name, address, qualifications and training, professional experience, photograph, telephone number(s) and email address(es).

15. We process the personal data for the purpose of assessing the application and to enter into a work contract with the selected person, until a decision has been made regarding the application. We inform the data subjects if our Company did not select them for that particular position, and at the same time we delete the personal data of every data subject with whom our Company did not enter into a work contract.
16. Recipient of personal data, and categories of recipients: persons exercising employer rights and persons carrying out human resources tasks at the Company.
17. Unlike the provisions of paragraph 15, for the purpose of establishing an employment relationship in the future, based on the consent of the data subject, our Company may process the data for one year, based on the explicit, voluntary and unequivocal consent of the data subject. We request a written permission to do so following the termination of the application procedure.

Processing based on the consent of the data subject

18. Where processing is based on consent, your consent to the processing of your personal data shall be obtained on the data collection form used by our Company and the privacy notice will be handed to you simultaneously. Where a written contract is concluded between you and our Company in relation to data processing, the above data collection form completed by you will be attached to the copy of the contract prepared in at least two original counterparts withheld by our Company.
19. By way of derogation from the provisions of clause 18, you may grant your consent in the written contract concluded in relation to the data processing, the fact of which will be recorded in the contract. In this case, filling out the data collection form under clause 18 and the provision of the data processing notice to you may not be required if the content thereof is recorded in the contract to the extent necessary.
20. Your consent covers all of our data processing activities carried out for the same purpose or purposes. Where data processing is carried out for multiple purposes, we request your consent for all of the data processing purposes.
21. Recipients of the personal data: employees performing customer service-related tasks.
22. Our Company does not request your consent for the processing of such personal data that are not necessary for using our services.
23. Unless otherwise regulated by law, our Company may process the personal data obtained with your consent for the fulfillment of its legal obligations without further separate consent, and also after your consent has been withdrawn. Processing pursuant to paragraphs 39-41 are specifically lawful under this legal title.
24. You have the right to withdraw your consent at any time which shall not affect the lawfulness of the processing prior to the withdrawal. You will be notified of this before you provide your consent.

Processing the data of contracting partners, maintaining registries of buyers, suppliers

25. Our Company shall manage the following personal data of the natural persons or the representatives of legal persons that entered into an agreement with it as buyers, clients or service providers for purpose of executing, performing, terminating contracts and providing contractual discounts, based on the data provided to our Company
- a. name
 - b. address
 - c. tax identification number or tax number
 - d. phone number
 - e. email address
 - f. bank account number
 - g. customer number (client number, order number)
 - h. online identifier (registration data, IP address)
26. We shall notify the natural person data subject prior to the commencement of the processing that the legal basis of the processing is the execution of the contract. This data processing is lawful even if the processing is for the purpose of implementing the measures that the data subject requested prior to entering into contract (making a quote, viewing a sample item etc.).
27. Recipients of the personal data as per point 25: employees performing tasks related to customer service, Accountant, online invoicing provider, and the Bank as processors.
28. Personal data are processed for the duration of the agreement, and after the termination of the agreement for the period stipulated in the relevant industry-specific legislation.

Contact via the Company website

29. Our Company does not use a general contact form on its website, therefore, if you would like to send an e-mail to us, you may send your message to the e-mail address shown in the contact details of the website. A notice with regard to the data processing is distinctly shown next to the e-mail address, separated from the other text sections.
30. The basis of the processing: your consent. The scope of the processed personal data: your name (first name, surname), e-mail address.
31. The purpose of personal data processing:
- a. performing the services required via e-mail, replying to the questions submitted
 - b. communication
 - c. providing information about the services of the Company
 - d. analyzing the usage of the website
32. Recipients of the personal data, and categories of the recipients: employees of the Company performing tasks related to its customer service.

33. The duration of the personal data processing: as long as the service is used or until your consent is withdrawn (until your request for erasure).

Data processing on the social site account of Company

34. Our Company maintains a Facebook, a LinkedIn, an Instagram and a Twitter account (hereinafter as 'social site accounts') in order to raise awareness of and promote its products and services.
35. The data processing regulations of each social site shall apply to visitors, therefore our Company will not process the personal data that the visitors publish on its social site pages.
36. Our Company shall not be liable for any infringing data content or posts published by the users of the social media sites. In the event that unlawful or offensive content is posted, our Company may, without prior notification, ban data subject from the members, or delete their posts.
37. The Company shall not be liable for errors, malfunctions resulting from the operation of the social site, or for issues resulting from a change in the functioning of the system.
38. Questions relating to data processing submitted on the social media account shall not be regarded by our Company as official complaints.

Data processing to fulfil taxation and accountancy obligations

39. Our Company processes the legally required personal data of natural persons or the representatives of legal persons that entered into a business relationship with it as buyers, clients or suppliers for the purpose of fulfilling taxation and accounting obligations for the period stipulated in the relevant industry-specific laws after the termination of the legal relationship it was based on.
40. The provisions of Act CL on the Rules of Taxation, Section 169 of CXXVII of 2017 on Value Added Tax, Section 167 of Act C of 2000 on Accounting are properly applied with regards to the processed data.
41. The recipients of the personal data: the employees of the Company performing taxation, accounting, payroll and social insurance tasks, and the Accountant as processor.

IV. The rights of the data subjects

42. In every data processing procedure, our Company wishes to provide the following rights of data subjects detailed in paragraphs 43-75:
- a. right to preliminary notification
 - b. right to access
 - c. right to rectification
 - d. right to erasure ("the right to be forgotten")
 - e. right to restriction of processing
 - f. right to data portability
 - g. right to object
 - h. communication of a personal data breach to the data subject
 - i. right to lodge a complaint with a supervisory authority

- j. right to an effective judicial remedy against a supervisory authority
- k. right to an effective judicial remedy against our Company or a data processor contracted by us

Right to preliminary notification

43. Data subject has the right to receive information on the facts and information related to the processing prior to the beginning of the processing.

*Information to be provided
where personal data are collected from the data subject*

44. Where the Company obtains the processed personal data from you, we will provide the following information to you at the same time as the personal data is obtained:
- a. name and contact details of our Company, as the controller, and of the processor acting on its request or under its instruction;
 - b. the name and contact details of the data protection officer, where applicable;
 - c. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d. where the processing is based on pursuing legitimate interests based on Article 6(1) point (f), the legitimate interests pursued by our Company or by a third party;
 - e. the recipients or categories of recipients of the personal data, if any;
 - f. the fact that our Company intends to transmit personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transmissions referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
45. In addition to the information referred to in paragraph 44, we will, at the time when personal data are obtained, provide you with the following further information necessary to ensure fair and transparent processing:
- a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. the existence of the right to request from the Company access to and rectification or erasure of your personal data or restriction of processing concerning your personal data or to object to processing such personal data;
 - c. your right to data portability;
 - d. where the processing is based on the data subject's consent as per point (a) of Article 6(1) of the Regulation or point (a) of Article 9(2) of the Regulation, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - e. the right to lodge a complaint with a supervisory authority;
 - f. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and of the possible consequences of failure to provide such data for you;

46. Where we intend to further process the personal data for a purpose other than that for which the personal data were collected, we shall provide you prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 45.
47. Pursuant to Article 13(4) of the Regulation, when you possess either a part or the whole of the information set forth in paragraphs 44-45, we are not required to provide information, or are only required to provide the missing information.

*Information to be provided
where personal data have not been obtained from the data subject*

48. Where personal data have not been obtained from you, we shall provide you with the following information once they have been obtained:
- a. name and contact details of our Company, as the controller, and of the processor acting on its request or under its instruction;
 - b. the name and contact details of the data protection officer, where applicable;
 - c. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d. the categories of personal data concerned;
 - e. the recipients or categories of recipients of the personal data, if any;
 - f. the fact that the controller intends to transmit personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transmissions referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
49. In addition to the information referred to in paragraph 48, we will provide you with the following information necessary to ensure fair and transparent processing:
- a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by our Company or a third party;
 - c. the existence of the right to request from the Company access to and rectification or erasure of your personal data or restriction of processing concerning your personal data or to object to processing such personal data;
 - d. your right to data portability;
 - e. where the processing is based on the data subject's consent as per point (a) of Article 6(1) of the Regulation or point (a) of Article 9(2) of the Regulation, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - f. the right to lodge a complaint with a supervisory authority;
 - g. from which source the personal data originate, and if applicable, whether it came from publicly accessible sources.

50. We shall provide the information referred to in paragraphs 48-49 as the followings:
- a. within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
 - b. if we use the personal data for communicating with you, at the latest at the time of the first communication with you; or
 - c. if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.
51. Where we intend to further process the personal data for a purpose other than that for which the personal data were collected, we shall provide you prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 49.
52. We are not required to inform you if:
- a. you already have the information;
 - b. providing the aforementioned information is not possible or it would require disproportionate efforts, therefore in such cases our Company will implement adequate measures so that your rights, freedoms and legitimate interests are not harmed;
 - c. obtaining or disclosure is expressly laid down by Union or domestic law to which the Company is subject and which provides appropriate measures to protect the data subject's legitimate interests;
 - d. the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or domestic law, including a statutory obligation of secrecy.

Data subject's right to access

53. You shall have the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
- a. your personal data is processed by our Company, or the processor acting on our request or under our instruction;
 - b. the purposes of data processing;
 - c. the categories of personal data concerned;
 - d. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - e. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - f. the existence of your right to request from the Company rectification or erasure of your personal data or restriction of processing of you personal data or to object to such processing;
 - g. the right to lodge a complaint with a supervisory authority;
 - h. where the personal data are not collected from you, any available information as to their source;
 - i. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged possible consequences of such processing for the data subject.

54. Where personal data are transferred to a third country or to an international organization, you shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of the Regulation relating to the transfer.
55. The Company shall provide you with a copy of the personal data undergoing processing without charge. For any further copies requested by you, we may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless you requested it otherwise, we shall provide the information in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Right to rectification

56. You have the right to obtain from our Company without undue delay the rectification of inaccurate personal data concerning you. Having regard to the purpose of the processing, you have the right to request the incomplete personal data to be completed by way of a supplementary declaration.
57. Our Company will not rectify the personal data concerning you if
- a. the accurate, truthful and complete personal data are not available to us and you fail to make them available to us, or
 - b. the truthfulness of the personal data provided to us by you cannot be determined beyond doubt.

Right to erasure ("the right to be forgotten")

58. You shall have the right to obtain from us the erasure of personal data concerning you without undue delay, and our Company shall be obliged to erase the personal data concerning you without undue delay, where one of the following grounds applies:
- a. personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b. You withdraw your consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of the Regulation, and where there is no other legal ground for the processing;
 - c. You object to the processing pursuant to Article 21(1) of the Regulation and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2);
 - d. the personal data have been unlawfully processed;
 - e. the personal data have to be erased for compliance with a legal obligation in Union or domestic law to which our Company is subject;
59. Where we have made the personal data public and are obliged to erase that personal data pursuant to paragraph 58, we, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform further controllers which are processing the personal data that you have requested us to erase any links to, or copy or replication of, those personal data.

Right to restriction of processing

60. You have the right to obtain from us the restriction of processing where one of the following applies:
- a. you contest the accuracy of the personal data, in this case the restriction is for a period enabling the Company to verify the accuracy of the personal data;
 - b. the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - c. Our Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
 - d. You have objected to processing pursuant to Article 21(1); in this case the restriction is for the period until it is verified whether or not the legitimate grounds of the Company override your legitimate grounds.
61. Where processing has been restricted under paragraph 60, such personal data shall, with the exception of storage, only 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 person.
62. A data subject who has obtained restriction of processing pursuant to paragraph 60 shall be informed by our Company before the restriction of processing is lifted.

Right to data portability

63. You have the right to receive the personal data concerning you provided to Controller in a structured, commonly used and machine-readable format and, in addition, have the right to transmit those data to another controller without a limitation by us if:
- a. the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
 - b. processing is carried out by automated means.
64. In exercising your right to data portability pursuant to paragraph 63, you shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
65. Exercising the right pursuant to paragraph 63 cannot prejudice the right to erasure (“right to be forgotten”) set forth in paragraph 17 of the Regulation and in paragraphs 58-59 of this Notice and cannot adversely affect the rights and freedoms of others.

Right to object

66. You shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) of Article 6(1) of the Regulation (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or point f) (processing is necessary for pursuing the legitimate interests of controller or a third party), including profiling based on those provisions.

67. If you wish to exercise your right set forth in paragraph 66, we shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
68. Where we process your personal data for direct marketing purposes, you shall have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to the processing of personal data for direct marketing purposes, we shall no longer process the personal data for such purposes.
69. At the latest at the time of the first communication with you, the right referred to in paragraphs 66 and 68 shall be explicitly brought to your attention and shall be presented clearly and separately from any other information.

Communication of a personal data breach to the data subject

70. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, we will communicate the personal data breach to you without undue delay.
71. In our communication to you referred to in paragraph 70, we shall describe in clear and plain language the nature of the personal data breach and, as set forth in points (b) - (d) of Article 33(3) of the Regulation,
- a. include at least the name and contact details of the data protection officer or the persons providing additional information.
 - b. we will include the likely consequences resulting from the personal data breach;
 - c. we will inform you of the measures implemented or planned to implement by our Company to remedy the personal data breach, including, if applicable, the measures to mitigate any adverse consequences resulting from the personal data breach.
72. We are not required to inform you as referred to in paragraph 71 if any of the following conditions are met:
- a. Our Company has implemented appropriate technical and organizational protection measures, and we apply those measures to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access the personal data, such as encryption;
 - b. we take subsequent measures after the personal data breach which ensure that the high risk to your rights and freedoms referred to in paragraph 70 is no longer likely to materialize;
 - c. communication would involve disproportionate effort, therefore in such cases, we shall instead use public communication or a similar measure whereby the data subjects are informed in an equally effective manner.

Right to lodge a complaint with a supervisory authority

73. Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, if you consider that the processing of personal data relating to you infringes this Regulation.

***Right to an effective judicial remedy against a controller
or a data processor***

74. Without prejudice to any available administrative or non-judicial remedy, you have the right to an effective judicial remedy where you consider that we did not process your personal data in compliance with this Regulation, as result of which we have infringed your rights under this Regulation.
75. Proceedings against our Company or a processor engaged by us shall be brought before a competent court where our Company or the processor has an establishment, or it can be brought before a Member State court where you have permanent residence.

**V. Lodging a request by the data subject,
the controller's measures**

Measures implemented on the request of the data subject

76. Our Company shall inform you of the measures taken in response to your request for the exercising of your rights without undue delay but under no circumstances later than one month after the receipt of such a request. That period may be extended by two further months where necessary, taking into account the complexity and the number of the requests. We will inform you of any such extension no later than one month after the request has been received and will provide the reasons for the delay.
77. Where you make the request by electronic means, and unless otherwise requested by you, the information, where possible, shall be provided by electronic means.
78. If we do not take action on your request, we will inform you of the reasons for not taking action without delay but not later than one month after the request has been received, and will inform you of the possibility of lodging a complaint with a supervisory authority or seeking a judicial remedy.
79. We will provide the information pursuant to Articles 13 and 14 of the Regulation and the information on the rights of the data subject (Articles 15-22 and 34 of the Regulation) without a fee. If your request is unquestionably unfounded or excessive, especially due to its repetitive nature, our Company may, with regard to the administrative costs of providing the requested information or communication or the implementation of the measures:
- a. charge a fee of HUF 10 000 + VAT, or
 - b. deny action in response to the request.

The circumstances proving the unquestionably unfounded or excessive nature of the request shall be attached to the request.

80. In cases where well-founded suspicions arise regarding your identity, we may request further information necessary to ensure that you are the affected.
