

# PRIVACY POLICY

## 1. Purpose of the Privacy Policy

The goal of our Privacy Policy is to provide all necessary information about processing your personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and assist the Data subjects in exercising their rights under Section 4.

The legal basis of our duty to communicate information is Article 12 of Regulation 2016/679 of the European Parliament and Council (hereinafter referred to as: GDPR) and the relevant Hungarian data protection regulations.

In the Privacy Policy, we may define you as “data subject” in the following.

You may find further definitions concerning your personal data within the Appendix of the current Privacy Policy.

## 2. Data of the controller

Name	<b>SigmaSzervíz Kft.</b>
Registry number	01-09-870044
Registered seat	1138 Budapest, Danubius u. 16. A. ép. 301.
Tax number	13726515-2-41
E-mail	info@sigmaszerviz.hu
Telephone number	+36 30 456 3424

## 3. Data processing activities

### *3.1. Processing concerning connection*

It is possible to connect us through the connection form located on the website. The details of such processing are described hereunder.

#### *3.1.1. Processed personal data and purpose of processing*

personal data	purpose of processing
name	identification of the Data subject

phone number	connecting and communication with the Data subject
e-mail address	connecting and communication with the Data subject

### *3.1.2. Legal basis of processing*

We process your personal data on your freely given consent that you provide in the moment of your connection by phone or email (article 6 (1) a) of GDPR).

### *3.1.3. Duration of the processing*

We process your personal data until the withdrawal of your consent. You have the right to withdraw your consent at any time via email. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### *3.1.4. Mode of processing*

Your personal data are collected manually, in electronic form.

## **4. What are you rights?**

### **4.1. Right to access:**

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information featured in point 3.

### **4.2. Right to rectification**

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **4.3. Right to erasure:**

You have the right to obtain from us the erasure of personal data concerning you without undue delay and we shall have the obligation to erase personal data without undue delay if it is mandatory according to Article 17 of GDPR.

### **4.4. Right to be forgotten:**

If we made the personal data public and are obliged to erase your personal data, we inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data

#### 4.5. Right to restriction of processing:

You have the right to obtain from us restriction of processing if is obligatory according to Article 18 of GDPR.

#### 4.6. Right to data portability:

You have the right to receive the personal data concerning you, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us if is possible according to Article 20 of GDPR.

#### 4.7. Right to complain:

You have the right to appeal to the Hungarian courts and to make a complaint to the Hungarian Supervisory Authority (<https://www.naih.hu/>).

## **5. Measures and notification**

### 5.1. Informing Data subjects

We communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 of GDPR to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We also inform you about those recipients on the request of yours.

### 5.2. Mode and deadline of notification

We provide information on action taken on a request under Articles 15 to 22 of GDPR to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, we provided the information by electronic means where possible, unless you request it otherwise.

If we do not take action on your request, we inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy (see point 4.7.).

### 5.3. Monitoring

If we have reasonable doubts concerning the identity of the natural person making the request, we may request the provision of additional information necessary to confirm the identity of the data subject.

#### 5.4. Costs of measures and notifications

We provide you information and take the necessary measures free of charge.

If your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or we refuse to act on your request.

## 6. Possible recipients

### 6.1. During the operation of our website

Our website's hosting provider (data processor) can have access to the personal data you provide while using the website. The data processor's data are the following:

Name: Sigmanet Kft.

Connection: <https://sigmanet.hu/>

### 6.2. Social media

Our website has Facebook profile so that if you „like” us on Facebook, we may learn all the personal data which is public on your profile.

## 7. Cookies

### 7.1. Cookies in general

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

## 7.2. Our cookies

The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

Cookie source	Cookie name	Cookie function	Cookie expiry
szigmaszerviz.hu	cookiebar	Remembering if the user has accepted cookies	30 days
google.com	_ga	Used to distinguish users anonymously	2 years
google.com	_gid	Used to distinguish users anonymously	24 hours
google.com	_gat	Used to throttle request rate of analytics logging	1 minute
google.com	NID, 1P_JAR, DV, CONSENT	Used by Google to remember user preferences on their service	1 minute-18 years

You can find the cookie policy of Google.com in the following link:

<https://policies.google.com/technologies/cookies?hl=en-US>

## 7.3. Blocking cookies

Most browsers allow you to refuse to accept cookies; for example:

- in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- in Firefox (version 39) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- in Chrome (version 44), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

## 7.4. Deleting cookies

You can delete cookies already stored on your computer; for example:

(a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);

(b) in Firefox (version 39), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and

(c) in Chrome (version 44), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

Deleting cookies will have a negative impact on the usability of many websites.

## **8. Other provisions**

### 8.1. Processing for different purpose

If we intend to further process the personal data for a purpose other than that for which the personal data were collected, we provide the you prior to that further processing with information on that other purpose and with any relevant further information.

### 8.2. Data protection

We secure your personal information from unauthorized access, use or disclosure. We secure the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as connection data) is transmitted to other Web sites, it is protected through the use of encryption.

### 8.3. Record of processing

To comply with section 30 of GDPR, we maintain a record of processing activities under our responsibility.

### 8.4. Data breaches

Data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. In case of data breach, we act according to section 33 and 34 of GDPR.

### 8.5. Changes to our Privacy Policy

We will occasionally update this Privacy Policy to reflect feedback. We encourage you to periodically review this Policy to be informed of how we are protecting your information.

Effective: 25 of September 2019

**SigmaSzervíz Kft.**  
Controller

## Appendix

### Definitions

- 'personal data' means any information relating to an identified or identifiable natural person ('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;
- '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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
- 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- 'pseudonymisation' means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- 'filing system' means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- '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 personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

- 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 'genetic data' means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- 'biometric data' means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- 'data concerning health' means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- 'enterprise' means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;
- 'group of undertakings' means a controlling undertaking and its controlled undertakings;
- 'supervisory authority' means an independent public authority which is established by a Member State pursuant to Article 51;
- 'supervisory authority concerned' means a supervisory authority which is concerned by the processing of personal data because:

- 'relevant and reasoned objection' means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;