

# COOPTECH KFT.

## DATA PROCESSING NOTICE

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## 1. PURPOSE OF THE DATA PROCESSING NOTICE

### 1.1 WHAT DO WE USE YOUR DATA FOR?

The purpose of the data processing notice is to ensure the enforcement of the constitutional protection of personal data, the realization of informational self-determination, and to define the data protection and data security rules applicable during the data processing of personal data managed by the company. Our company pays significant attention to protecting the privacy of personal data throughout its processing. We process personal data exclusively in accordance with legal provisions while maintaining their confidential nature.

### 1.2 APPLICABLE LEGISLATIONS

Cooptech Kft. must act in compliance with the following laws during data processing as set out in this Data Processing Notice:

- **Regulation 2016/679 of the European Parliament and of the Council (April 27, 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: GDPR)
- **Act CXII of 2011 on the Right to informational Self-Determination and Freedom of Information** (hereinafter: Info Act)

## 2. COLLECTION, PROCESSING, AND USE OF PERSONAL DATA

### 2.1 PRINCIPLES

According to Article 4, point 1 of the GDPR, personal data refers to any information related to an identified or identifiable natural person, including, for example, names, addresses, non-corporate phone numbers, non-corporate email addresses, and essential data in employment contracts. Our company collects, processes, and uses personal data only when there is a legal basis for doing so.

### 2.2 CATEGORIES OF PROCESSED DATA:

Data processing occurs in the following cases:

- **Employee Data:**
  - Data related to employment
  - Data related to fitness assessments
  - Data related to monitoring email account usage
  - Data related to checking computers and laptops

- Data related to the control of the use of company mobile phones
  - Data related to workplace camera surveillance
- Data of job applicants
- Contract-related data management
  - Managing the data of contractual partners, registering customers and suppliers
  - Contact details of natural person representatives of legal entity clients, buyers, suppliers
- Data management based on legal obligations
  - Data management for tax and accounting obligations
  - Payer data management

### 2.3 ON WHAT BASIS DO WE PROCESS YOUR DATA?

- Because you agreed to it
- Because it is absolutely necessary to fulfil the contract you have concluded
- Because the legitimate interest of Cooptech Kft. so requires
- Because Cooptech Kft. is required by law to process your data

## 3. DATA CONTROLLER AND DATA PROCESSOR

A Cooptech Kft. is the responsible data controller for processing your data.

The contact details of our company:

Cooptech Kft., 2330 Dunaharaszti, Duna utca 29.

E-mail address: [info@cooptech.net](mailto:info@cooptech.net)

Cooptech Kft. has contracted subcontractors who perform data processing activities, by having access to Cooptech Kft.'s personal data, but this is necessary for their work. The processing of data necessary for these activities is governed by the contract of engagement and confidentiality agreement with them.

### 3.1 WHICH PRINCIPLES DO WE FOLLOW DURING OUR DATA MANAGEMENT?

Our Company follows the following principles in the data management:

- We process personal data legally and fairly and in a transparent manner for you.
- We collect personal data only for specified, explicit and legitimate purposes and do not process it in a way incompatible with those purposes.
- The personal data we collect and manage are appropriate and relevant for the purposes of data management, and are limited to what is necessary.
- Our company takes all reasonable measures to ensure that the data we manage are accurate and, if necessary, up-to-date, and we delete or correct inaccurate personal data immediately.
- Personal data will be stored in a form which allows you to be identified only for the time necessary to achieve the purposes for which the personal data are processed.

- We use appropriate technical and organisational measures to ensure adequate security of personal data against unauthorised or unlawful processing, accidental loss, destruction or damage.

### 3.2 DATA STORAGE

Only authorised employees of Cooptech Kft. who need to have access to your personal data in order to carry out their activities may have access to your personal data. We will only disclose your personal data to third parties, external bodies or organisations if you have consented to the transfer or if the transfer is required or permitted by law.

#### 3.2.1 DURATION OF DATA MANAGEMENT

The data processing deadline may differ depending on the legal basis:

- For employees, it is valid under the employment contract
- 5 years after the end of the contract

## 4. USE OF COOKIES

The <https://cooptech.hu> website stores information in the form of cookies on your browsing device, which information may be considered personal data. Below you can decide which types of cookies you want to allow. You can find complete information on the use of cookies in the Cookie information.

### 4.1 WHAT IS A COOKIE? (COOKIE NOTICE)?

A cookie is a small file that is placed on your computer when you visit a website. Cookies have countless functions. Among other things, they collect information, remember the individual settings of the visitor and generally facilitate the use of the website. <https://cooptech.hu> uses cookies for the following purposes: collecting information about how you use the website - by assessing which parts of the website you visit or use the most, so we can find out how to provide you with an even better user experience if you visit our site again, website development. How can you check and disable cookies? All modern browsers allow changing the cookie settings. Most browsers automatically accept cookies by default, but these can usually be changed. Please note that since the purpose of cookies is to facilitate or enable the usability and processes of our website, by preventing or deleting the use of cookies, it is possible that our users will not be able to fully use the functions of our website, or the website will work differently in their browser than intended.

## 5. USER RIGHTS

III of the GDPR (rights of data subjects), according to the provisions and conditions specified in chapter (rights of data subjects), the data subject has the right to:

### 5.1 THE RIGHT TO TRANSPARENT INFORMATION

You can request information about your personal data management at any time. It is important to know the rights and legal remedies of the private person affected by the data management (hereafter referred to as the data subject) because the data manager manages personal data. All information based on which the data subject can be identified is considered personal data. Thus, personal data is not only the name and identification number of the person concerned, but also the physical, mental, etc. also knowledge characteristic of his identity.

### 5.2 RIGHT OF ACCESS TO YOUR PERSONAL DATA

You have the right to receive feedback from the controller as to whether your personal data is being processed, and if such data processing is in progress, you are entitled to access the personal data and the following information: the purposes of the data processing; categories of personal data concerned; the recipients or categories of recipients to whom or to whom the personal data has been or will be communicated, including in particular recipients in third countries and international organizations; the planned period of storage of personal data; the right to rectification, deletion or limitation of data processing and the right to protest; the right to submit a complaint to the supervisory authority; information about data sources; the fact of automated decision-making, including profiling, as well as comprehensible information about the applied logic and the significance of such data management and the expected consequences for the data subject. The data controller shall provide the information within a maximum of one month from the date of submission of the request.

### 5.3 THE RIGHT TO CORRECT OR DELETE YOUR DATA ON REQUEST ("THE RIGHT TO BE FORGOTTEN") AND THE RIGHT TO LIMIT DATA PROCESSING

In Chapter III of the GDPR (rights of data subjects), according to the provisions and conditions specified the data subject has the right to:

As a general rule, all stakeholders can apply to the given data controller:

1. access to your personal data,
2. correcting your personal data,
3. deletion of your personal data,
4. the limitation of the given data management,

5. portability of your personal data,
6. you can also object to the processing of your personal data
7. in case of automated decision-making, the data subjects have the right not to be covered by the scope of the decision,

Right to legal remedy: if the data subject understands his rights, he can contact the data privacy officer or the National Data Protection and Freedom of Information Authority or the court.

### 5.3.1 RIGHT OF ACCESS TO YOUR PERSONAL DATA

Based on this right, you are entitled to receive feedback from the data controller as to whether your personal data is being managed, and if such data is being managed, you are entitled to access your personal data and the information listed in the General Data Protection Regulation, for example:

- the purpose and legal basis of data management,
- recipients of personal data or categories of recipients,
- in the case of transfers to third countries or international organisations, the information about the transfer;
- the duration of the data management or aspects thereof,
- the rights and remedies of the data subject,,
- the consequences of not providing the data.

The data controller is obliged to provide you with a copy of your personal data that is the subject of data management.

### 5.3.2 YOUR RIGHT TO CORRECT YOUR PERSONAL DATA

On the basis of your right to rectification, you are entitled, on the one hand, to request that the data controller correct inaccurate personal data concerning you without undue delay, and on the other hand, you are entitled to request that your incomplete personal data be supplemented.

### 5.3.3 YOUR RIGHT TO DELETE AND "FORGET" YOUR PERSONAL DATA

As a general rule, based on your right to erasure, you are entitled to have the data controller delete your personal data without undue delay at your request, and the data controller is obliged to delete them without undue delay, under certain conditions.

Regarding this data subject right, it is important to note that it is not possible to delete and "forget" personal data if exists one of the cases defined in Article 17 (3) of the GDPR regulation.



#### 5.3.4 YOUR RIGHT TO LIMIT THE PROCESSING OF YOUR PERSONAL DATA

- You are entitled to have the data controller restrict or block data processing at your request, if one of the following conditions is met:
- You dispute the accuracy of your personal data. In this case, the limitation applies to the period that allows the data controller to verify the accuracy of this personal data;
- the data processing is unlawful and you object to the deletion of your personal data and instead request the restriction of their use;
- the data controller no longer needs the personal data for the purpose of data management, but you require them to present, enforce or defend legal claims;
- You objected to data processing. In this case, the limitation applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over your legitimate reasons.

#### 5.3.5 YOUR RIGHT TO PORTABILITY OF YOUR PERSONAL DATA

Based on this right, you are entitled to receive your personal data provided to a data controller in a segmented, widely used, machine-readable format, and you are also entitled to transfer this personal data to another data controller without being hindered by the data controller to whom you made the personal data available. You can exercise this right if the data management is based on consent or a contract and the data management is automated.

#### 5.3.6 YOUR RIGHT TO OBJECT AGAINST THE MANAGING OF YOUR PERSONAL DATA

You have the right to object to the processing of your personal data at any time for reasons related to your own situation, if the processing of your personal data takes place due to the legitimate interest of the data controller or the nature of public authority. If personal data is processed for direct business acquisition, you have the right to object at any time to the processing of your personal data for this purpose, including profiling, if it is related to direct business acquisition. If you object to the processing of your personal data for direct business purposes, your personal data may no longer be processed for this purpose.

#### 5.3.7 RIGHTS OF THE DATA SUBJECT IN CASE OF AUTOMATED DECISION MAKING

As a data subject, you have the right not to be subject to the scope of a decision based solely on automated data management, including profiling, which would have legal effects on you or similarly significantly affect you.

This provision does not apply if:

- a) Necessary to conclude or fulfill the contract between you and the data controller;



b) it is made possible by EU or member state law applicable to the data controller, which also establishes appropriate measures for the protection of your rights and freedoms, as well as your legitimate interests; or

c) is based on your express consent.

The data manager is obliged to provide you with at least the right to request human intervention on the part of the data manager, to express your point of view and to submit objections to the decision.

## 6. CLAIMS FOR REMEDIES (OR AVAILABLE OPTIONS)

The right to a remedy - in the event of a violation of your rights, to the Data Protection Officer or the National Data Protection and Freedom of Information Authority

### 6.1 DUTIES OF THE DATA PROTECTION OFFICER

(IT Act. Section 25/M. Paragraph (1), GDPR Chapter IV Section 4 Article 39)

The data protection officer checks compliance with the GDPR and other EU or Member State data protection provisions, as well as the internal rules of the data controller or data processor regarding the protection of personal data, including the assignment of tasks, awareness-raising and training of staff involved in data management operations, and also the related audits.

### 6.2 THE RIGHT TO COMPLAINT WITH A SUPERVISORY AUTHORITY:

About investigations that can be initiated at the National Data Protection and Freedom of Information Authority: By filing a report with the National Data Protection and Freedom of Information Authority (hereinafter the Authority), anyone (not only you) can initiate an investigation citing that a violation of rights has occurred in connection with the handling of personal data, or there is an immediate risk of such a violation. It is important that the report is not anonymous, otherwise the Authority may reject the report without a substantive investigation. Further reasons for rejection are provided by IT Act. 53 § Section (2) contains.

Contact information of the National Data Protection and Freedom of Information Authority:

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Phone number: +36 1 391 -1400

Fax: +36 1 391 -1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Web site: [www.naih.hu](http://www.naih.hu)

### 6.3 ENFORCEMENT IN COURT

In case of violation of your rights, you can go to court against the data controller and processor, as everyone concerned is entitled to an effective judicial remedy if, in your opinion, your rights set forth in the GDPR have been violated as a result of the processing of your personal data not in accordance with the GDPR. The lawsuit against the data manager or data processor must be initiated before the court of the Member State where the data manager or data processor operates. In Hungary, the lawsuit can be initiated - at the choice of the data subject - before the court of the data subject's place of residence or residence. The data subject may demand compensation/damage from the data controller in the lawsuit.

## 7. MODIFICATION OF THE DATA PROCESSING NOTICE

Our company reserves the right to change its security and data protection measures. In such cases, our Company amends its data protection information accordingly and sends a circular email about the amendment, makes the latest version of the data protection information available to its employees and on the website.


## 8. CONTACT POINT

To make suggestions or complaints regarding the handling of your personal data, we recommend that you contact our Company's Data Protection Officer:

Responsible for data protection:

Cooptech Kft.  
Post office account: 741  
Duna utca 29.  
H-2330 Dunaharaszti  
or  
Mailto: [info@cooptech.net](mailto:info@cooptech.net)

Dunaharaszti, 27 June 2024



Balázs Vigh  
Managing Director