

## PRIVACY POLICY AND INFORMATION NOTICE

**LG TECHNOLOGIES Korlátolt Felelősségű Társaság** (registered office: 2161 Csomád, Levente utca 14.

A. ép., company registration number: 13-09-231888, tax number: 24376004-2-13, statistical number: 24376004- 3314-113-15, registration body: the Company Court of the Budapest District Court, *hereinafter referred to as the Company or the Contractor or the Company*) complies with its obligations under Regulation 2016/679 of the European Parliament and of the Council (hereinafter referred to as the GDPR) by publishing this Privacy Policy.

### I. NAME OF THE CONTROLLER

**LG TECHNOLOGIES Limited Liability Company** informs the data subject that it is a data controller for the processing of certain personal data. The data controller is:

Name: **LG TECHNOLOGIES Korlátolt Felelősségű Társaság**

Registered office: 2161 Csomád, Levente utca 14.

VAT number: 24376004-2-13

Company registration number: 13-09-231888

Court of registration: the Companies Court of the Budapest District Court

Phone: +36 70 563 0493

E-mail: [info@lgtechnologies.hu](mailto:info@lgtechnologies.hu)

Representative Károly Lengyel Managing Director

### II. DEFINITIONS

(A GDPR concerning provisions)

a) personal data: 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, 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 processing: 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, consultation, consultation,

use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

c) restriction of processing: marking of personal data stored for the purpose of restricting their future processing

d) filing system: a set of personal data structured in any way, whether centralised, decentralised or structured according to functional or geographical criteria, which is accessible on the basis of specific criteria

e) controller: the natural or legal person, public authority, agency or any 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 the processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law

f) data processor: a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller

g) recipient: the natural or legal person, public authority, agency or any other body, whether or not a third party, to whom or with whom the personal data are disclosed. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing

h) third party: a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data

i) the data subject's consent: a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her

j) data breach: 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

### III. THE NAME OF THE DATA PROCESSOR

**LG TECHNOLOGIES Limited Liability Company** uses a data processor for the operation and maintenance of its website, IT solutions, accounting and payroll services and auditing. Data processors used by **LG TECHNOLOGIES Limited Liability Company**:

#### 1. Accountant

Company name: Tower Interconsult Kft.

Headquarters: 134 Budapest, Váci út 45. G. ép. VII. floor. Company

registration number: 01-09-995297

Tax number: 24200943-2-41

Activity: 6920'08 - Accounting, auditing and tax consultancy activities

## 2. Website operator

Company name: Websupport

Magyarország Kft

Head office: 1119 Budapest, Fehérvári út 97-99.

Company registration number: 01-09-381419

Tax number: 25138205-2-43

Activity: 6311'08 - Data processing, web hosting services

## IV. GENERAL DATA PROCESSING RULES

a) The personal data may be disclosed to employees of LG Technologies Ltd. with access rights related to the relevant data management purpose, in particular to employees performing administrative tasks or to persons or organisations performing data processing activities for LG Technologies Ltd. under contract, to the extent and to the extent necessary for the performance of their activities, as determined by LG Technologies Ltd., or to law firms, lawyers and their sub-clients representing LG Technologies Ltd.

b) The data processing activities set out in this policy are directed at the personal data of natural persons and are not limited to the natural persons concerned by the processing.

c) The CEO of LG Technologies Ltd. shall ensure that all employees and officers of LG Technologies Ltd. comply with the provisions of the GDPR and this Policy.

d) LG Technologies Ltd. stores the personal data it processes at its headquarters and in a database in the form of electronic files, and some data on paper documents, while maintaining the legal requirements for data security.

## V. SINGLE CONTRACTING ACTIVITIES OF LG TECHNOLOGIES LTD.

a) Data processing in the performance of contracts

LG Technologies Ltd. shall provide the natural persons contracting with it and natural persons employed by legal entities with the personal data necessary for the performance of the contract.

for the period necessary for the performance of the contract. The legal basis for the processing of data by LG Technologies Ltd. is the performance of the contract (Article 6 (1) (b) GDPR) and the consent of the User (Article 6 (1) (a) GDPR), the purpose of the processing is to maintain contact with the natural person who entered into the contract, to enforce the claims arising from the contract and to fulfil the obligations arising from the contract.

The personal data processed may include: natural person identification data (name, name at birth, place and date of birth, mother's name, address), telephone number, e-mail address, tax number, bank account number, social security number, identity document number.

LG Technologies Ltd. will process the personal data of the natural persons contracting with it for the period specified by the legal provisions requiring the retention of the contract.

#### b) Processing of data necessary for the performance of contracts

The main activity of LG Technologies Ltd. is the construction, maintenance and installation of air handling and other equipment, as well as other construction works. LG Technologies Ltd. will provide its employees and subcontractors with the personal data of the natural persons contracting with it, such as **name, mother's name, date and place of birth, telephone number, email address and address**, if necessary for the performance of the contract, for the purpose of contacting customers, for the duration of the contract.

#### c) Data processing during the employment relationship

LG Technologies Ltd. processes the personal data of its employees as recorded in the employment register. These are: Name; mother's name; address and address of residence and notification address; contact details (telephone number, e-mail address); social security number, tax identification number, type and number of identity document; amount of salary; name of the financial institution holding the account and account number; the amount and title of deductions and withholdings from wages and the account number of the person entitled to the deductions and withholdings; the names and social security numbers of children and dependants; the name and contact details of the next of kin to be notified.

The purpose of the processing: the performance of obligations and exercise of rights arising from the employment relationship, the establishment and termination of the employment relationship.

Duration of data processing: the duration of the employment relationship and 8 years after termination of the employment relationship or, if longer, the period specified by law.

Legal basis for processing: legitimate interest of the employer, performance of a legal obligation, performance of an employment contract. The employee must be informed of the legal basis and the purpose of the processing before the processing starts.

#### d) Processing of data to fulfil accounting obligations

LG Technologies Ltd. processes the data of those natural persons who are contractually bound to LG Technologies Ltd. and to whom LG Technologies Ltd. is subject to obligations under the legal provisions on accounting, as necessary to fulfil these legal obligations. The purpose of the processing is to ensure the mandatory content of the invoice

issuing the invoice, carrying out accounting tasks related to invoicing. Scope of the data processed. Employees of LG Technologies Ltd. who perform invoicing and related accounting activities as part of their job duties are entitled to access the personal data processed. LG Technologies Ltd. is entitled to process personal data recorded in the course of the performance of the legal obligation referred to above for a period of 8 years from the termination of the contract (business relationship).

k) Data processing related to the fulfilment of tax and contribution obligations

In accordance with the legal provisions governing taxation, LG Technologies Ltd. submits monthly, by the twelfth day of the month following the month in question, an electronic return on all taxes, contributions and mandatory data related to payments and benefits made to natural persons resulting in tax and/or social security obligations.

The data processing may be carried out by employees of LG Technologies Ltd. performing payroll activities as part of their job duties or by companies and individual entrepreneurs entrusted with these tasks. LG Technologies Ltd. will process the data processed in connection with the fulfilment of tax and contribution obligations for the period prescribed by the legal provisions governing the tax regime.

## VI. LEGAL BASIS FOR PROCESSING

a) Consent of the data subject

The lawfulness of the processing of personal data must be based on the data subject's consent or on some other legitimate basis established by law.

In the case of processing based on the data subject's consent, the data subject may give his or her consent to the processing of his or her personal data in the following form:

- a) in writing, in the form of a declaration of consent to personal data processing,
- b) electronically, by an explicit conduct on the LG Technologies Ltd. website, by ticking a box, or by making technical settings when using information society services, as well as any other statement or action that unambiguously indicates the data subject's consent to the intended processing of his or her personal data in the relevant context.

Silence, ticking a box or inaction does not constitute consent.

Consent covers all processing activities carried out for the same purpose or purposes.

If the processing is for more than one purpose, consent must be given for all the purposes for which the data are processed. Where the data subject gives his or her consent following an electronic request, the request must be clear and concise and must not unnecessarily impede the use of the service for which consent is sought.

The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal. The withdrawal of consent shall be made possible in the same simple manner as the giving of consent.

#### b) Performance of the contract

Processing is lawful where it is necessary for the performance of a contract to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into a contract.

Consent given by the data subject to the processing of personal data not necessary for the performance of the contract shall not be a condition for the conclusion of the contract.

#### c) To comply with a legal obligation to which the controller is subject or to protect the vital interests of the data subject or of another natural person

The legal basis for processing is determined by law in the case of the performance of a legal obligation, so the data subject's consent is not required for the processing of their personal data.

The controller shall inform the data subject of the purposes, legal basis, duration, identity of the controller, the data subject's rights and remedies.

The controller is entitled to process the data necessary for compliance with a legal obligation to which the data subject is subject, after the withdrawal of the data subject's consent.

#### d) Execution of a task carried out in the public interest or in the exercise of official authority vested in the controller, or in the legitimate interests of the controller or of a third party.

The legitimate interests of the controller, including the controller with whom the personal data may be shared, or of a third party may constitute a legal ground for processing, provided that the interests, fundamental rights and freedoms of the data subject do not override the legitimate interests of the data subject, taking into account the data subject's reasonable expectations in his or her relationship with the controller. Such a legitimate interest may, for example, exist where there is a relevant and appropriate relationship between the data subject and the controller, such as in cases where the data subject is a client of the controller or is employed by the controller.

In order to establish the existence of a legitimate interest, it is necessary to carefully assess, inter alia, whether the data subject could reasonably expect, at the time and in the context of the collection of personal data, that processing for the purposes in question would take place.

The interests and fundamental rights of the data subject may override the interests of the controller if the personal data are processed in circumstances in which the data subjects do not expect further processing.

## VII. THE RIGHTS OF THE DATA SUBJECT WITH REGARD TO THE PROCESSING OF HIS OR HER DATA

a) The following is a brief summary of the rights of the data subject LG Technologies Ltd:

The data subject has the right to:

to be informed before the processing starts,

to receive feedback from the controller as to whether or not his or her personal data are being processed and, if such processing is taking place, to have access to the personal data and the following information,

to request the rectification or erasure of his/her data, to be informed by the controller of the occurrence of such a rectification or erasure, to request the restriction of processing, to be informed by the controller of the occurrence of such a restriction,

for data portability,

to object if your personal data are processed for reasons of public interest or on the basis of the legitimate interests of the controller.

be exempt from automated decision-making, including profiling,

to lodge a complaint with the supervisory authority. The data subject may exercise his or her right to lodge a complaint by contacting:

**Hungarian National Authority for Data Protection and**

**Freedom of Information, address: 1125 Budapest,**

**Szilágyi Erzsébet fasor 22/c., Phone: +36 (1) 391-1400;**

**Fax: +36 (1) 391-1410.,**

**[www.naih.hu](http://www.naih.hu);**

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

an effective judicial remedy against the supervisory authority,

effective judicial remedies against the controller or processor, and to be informed of the data breach.

b) Detailed information on the rights of the data subject

Right to information

(1) The data subject has the right to be informed of the information relating to the processing of his or her data before the start of the processing operation.

(2) Information to be provided:

the identity and contact details of the controller and, if any, the controller's representative;

the contact details of the Data Protection Officer, if any;

the purposes for which the personal data are intended to be processed and the legal basis for the processing;

in the case of processing based on Article 6(1)(f) of the Regulation, the legitimate interests of the controller or a third party;

where applicable, the recipients of the personal data and the categories of recipients, if any;

where applicable, the fact that the controller intends to transfer the personal data to a third country or an international organisation and the existence or absence of an adequacy decision by the Commission or, in the case of a transfer referred to in Article 46, Article 47 or the second subparagraph of Article 49(1) of the Regulation, an indication of the appropriate and adequate safeguards and a reference to the means of obtaining a copy or the availability of a copy.

(3) In addition to the information referred to in paragraph 1, the controller shall, at the time of obtaining the personal data, in order to ensure fair and transparent processing, provide the data subject with the following additional information:

the duration of the storage of personal data or, where this is not possible, the criteria for determining that duration;

the right of the data subject to request the controller to access, rectify, erase or restrict the processing of personal data concerning him or her and to object to the processing of such personal data, and the right to data portability;

in the case of processing based on Article 6(1)(a) or Article 9(2)(a) of the Regulation, the right to withdraw consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of consent prior to its withdrawal;

the right to lodge a complaint with a supervisory authority;



whether the provision of the personal data is based on a legal or contractual obligation or is a precondition for the conclusion of a contract, whether the data subject is under an obligation to provide the personal data and the possible consequences of not providing the data;

the fact of automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the Regulation, and, at least in those cases, clear information on the logic used and the significance of such processing and its likely consequences for the data subject.

(4) If the controller intends to further process personal data for a purpose other than that for which they were obtained, the controller shall inform the data subject of that other purpose and of any relevant additional information referred to in paragraph 2 before further processing.

(5) Paragraphs 1 to 3 shall not apply if and to the extent that:

the data subject already has the information;

the provision of the information in question proves impossible or would involve a disproportionate effort, in particular in the case of processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, taking into account the conditions and guarantees referred to in Article 89(1), or where the obligation referred to in paragraph 1 of this Article would be likely to render impossible or seriously impair the achievement of the purposes of such processing. In such cases, the controller shall take appropriate measures, including making the information publicly available, to protect the rights, freedoms and legitimate interests of the data subject;

the acquisition or disclosure of the data is expressly required by Union or Member State law applicable to the controller, which provides for appropriate measures to protect the data subject's legitimate interests; or

the personal data must remain confidential under an obligation of professional secrecy imposed by EU or Member State law, including a legal obligation of secrecy.

Right of access of the data subject

(1) The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the following information:

the purposes of the processing;

the categories of personal data concerned;

the recipients or categories of recipients to whom or with whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;

where applicable, the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;

the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;

the right to lodge a complaint with a supervisory authority;

if the data were not collected from the data subject, any available information on their source;

the fact of automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the Regulation and, at least in those cases, the logic used and clear information on the significance of such processing and its likely consequences for the data subject.

(2) Where personal data are transferred to a third country or an international organisation, the data subject shall have the right to be informed of the appropriate safeguards for the transfer in accordance with Article 46.

(3) The data controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the data subject requests otherwise.

The data subject's right to rectification and erasure

The right to rectification

(1) The data subject shall have the right to obtain, at his or her request and without undue delay, the rectification by the controller of inaccurate personal data relating to him or her. Taking into account the purposes of the processing, the data subject shall have the right to obtain the rectification of incomplete personal data, including by means of a supplementary declaration.

Right to erasure ("right to be forgotten")

(1) The data subject shall have the right to obtain from the controller the erasure of personal data relating to him or her without undue delay at his or her request, and the controller shall be obliged to provide the data subject with the following

without undue delay if one of the following grounds applies:

the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

the data subject withdraws his or her consent pursuant to Article 6(1)(a) of the Regulation (consent to the processing of personal data) or Article 9(2)(a) of the Regulation (explicit consent) and there is no other legal basis for the processing;

the data subject objects to the processing on the basis of Article 21(1) of the Regulation (right to object) and there is no overriding legitimate ground for the processing, or the data subject objects to the processing on the basis of Article 21(2) of the Regulation (objection to processing for commercial purposes);

the personal data have been unlawfully processed;

the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;

personal data have been collected in connection with the provision of information society services referred to in Article 8(1).

(2) If the controller has disclosed the personal data and is obliged to erase it at the request of the data subject, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to or copies or replicas of the personal data in question.

(3) Paragraphs 1 and 2 shall not apply where the processing is necessary:

to exercise the right to freedom of expression and information;

for the purposes of complying with an obligation under Union or Member State law to which the controller is subject to which the processing of personal data is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

on grounds of public interest in the field of public health pursuant to Article 9(2)(h) and (i) of the Regulation and Article 9(3) of the Regulation;

for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the Regulation, where the right referred to in paragraph 1 would be likely to render such processing impossible or seriously impair it; or

to bring, enforce or defend legal claims.

## Right to restriction of processing

(1) The data subject shall have the right to obtain, at his or her request, the restriction of processing by the controller if one of the following conditions is met:

the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the controller to verify the accuracy of the personal data;

the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;

the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or

the data subject has objected to the processing pursuant to Article 21(1) of the Regulation; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

(2) Where processing is restricted pursuant to paragraph 1, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

(3) The controller shall inform the data subject at whose request the processing has been restricted pursuant to paragraph 1 in advance of the lifting of the restriction.

## Obligation to notify the rectification or erasure of personal data or restriction of processing

(1) The controller shall inform any recipient to whom or with which the personal data have been disclosed of the rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort.

(2) The controller shall inform the data subject of these recipients at his or her request.

## The right to data portability

(1) The data subject has the right to receive personal data relating to him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format,

is also entitled to transfer those data to another controller without hindrance from the controller to whom he or she has disclosed the personal data, if:

the processing is based on consent pursuant to Article 6(1)(a) of the Regulation (consent to the processing of personal data) or Article 9(2)(a) of the Regulation (explicit consent to processing) or on a contract pursuant to Article 6(1)(b); and

the processing is carried out by automated means.

(2) In exercising the right to data portability under paragraph 1, the data subject shall have the right to request, where technically feasible, the direct transfer of personal data between controllers.

(3) The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17 of the Regulation. That right shall not apply where the 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.

(4) The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

#### The right to protest

1) The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data carried out in the exercise of his or her official authority or in the public interest or to processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party (processing based on Article 6(1)(e) or (f) of the Regulation), including profiling based on those provisions. In such a case, the controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

(2) Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

(3) If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

(4) The right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject at the latest at the time of the first contact with the data subject and the information shall be clearly displayed separately from any other information.

(5) In the context of the use of information society services and by way of derogation from Directive 2002/58/EC, the data subject may exercise the right to object by automated means based on technical specifications.

(6) Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the Regulation, the data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

#### Right to exemption from automated decision-making

(1) The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

2) Paragraph 1 shall not apply where the decision:

necessary for the conclusion or performance of a contract between the data subject and the controller;

is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or

is based on the explicit consent of the data subject.

(3) In the cases referred to in points (a) and (c) of paragraph 2, the controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right to obtain human intervention by the controller, to express his or her point of view and to object to the decision.

(4) The decisions referred to in paragraph 2 shall not be based on the processing of personal data in accordance with the special categories referred to in Article 9(1), except where Article 9(2)(a) or (g) applies and appropriate measures have been taken to safeguard the rights, freedoms and legitimate interests of the data subject.

The data subject's right to complain and seek redress

Right to lodge a complaint with a supervisory authority

(1) The data subject has the right to lodge a complaint with the supervisory authority under Article 77 of the Regulation if he or she considers that the processing of personal data relating to him or her infringes this Regulation.

(2) The data subject may exercise his or her right to lodge a complaint by contacting:

National Authority for Data Protection and Freedom of Information Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c Phone: +36 (1) 391-1400; Fax: +36 (1) 391-1410 www: <http://www.naih.hu> e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

(3) The supervisory authority with which the complaint has been lodged shall inform the client of the procedural developments concerning the complaint and its outcome, including the right of the client to seek judicial remedy under Article 78 of the Regulation.

Right to an effective judicial remedy against the supervisory authority

(1) Without prejudice to any other administrative or non-judicial remedy, any natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning him or her.

(2) Without prejudice to any other administrative or non-judicial remedy, any data subject shall have the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments concerning the complaint lodged under Article 77 of the Regulation or of the outcome of the complaint.

(3) Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

(4) If proceedings are brought against a decision of a supervisory authority on which the Board has previously issued an opinion or taken a decision under the consistency mechanism, the supervisory authority must send the opinion or decision to the court.

The right to an effective judicial remedy against the controller and the processor

(1) Without prejudice to the administrative or non-judicial remedies available, including the right to lodge a complaint with a supervisory authority under Article 77, any data subject shall have an effective judicial remedy if he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data not in accordance with this Regulation.

(2) Proceedings against the controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. Such proceedings may also be brought before the courts of the Member State in which the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in its exercise of official authority.

c) Restrictions

(1) Union or Member State law applicable to a controller or processor may, by means of legislative measures, restrict the scope of the rights and obligations set out in Article 5 in respect of its provisions in Articles 12 to 22 and Article 34 and in accordance with the rights and obligations set out in Articles 12 to 22, if the restriction respects the essential content of fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to protect them:

national security; defence;

public safety;

the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the protection against and prevention of threats to public security;



other important objectives of general interest of the Union or of a Member State, in particular important economic or financial interests of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security;

the independence of the judiciary and the protection of judicial procedures;

prevent, investigate, detect and prosecute ethical violations in regulated professions;

in the cases referred to in points (a) to (e) and (g), even occasionally, control, inspection or regulatory activities connected with the exercise of official authority;

to protect the rights and freedoms of data subjects or others; to pursue civil claims.

(2) From(1) paragraph referred to in legislative measures given at where applicable contain at least detailed provisions on:

the purposes or categories of processing, categories of personal data,

the scope of the restrictions imposed,

safeguards to prevent misuse or unauthorised access or disclosure,

to define the controller or to define categories of controllers,

the duration of storage and the applicable safeguards, taking into account the nature, scope and purposes of the processing or categories of processing,

the risks to the rights and freedoms of data subjects, and

the data subject's right to be informed of the restriction, unless this may adversely affect the purpose of the restriction. d) Information about the personal data breach

(1) Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject of the personal data breach without undue delay.

(2) The information referred to in paragraph 1 provided to the data subject shall clearly and plainly describe the nature of the personal data breach and shall include at least the following information

the name and contact details of the Data Protection Officer or other contact person who can provide further information, the likely consequences of the personal data breach, the measures taken or envisaged by the controller to remedy the personal data breach,

including, where appropriate, measures to mitigate any adverse consequences of the data breach.

(3) The data subject need not be informed as referred to in paragraph 1 if any of the following conditions are met:

the controller has implemented appropriate technical and organisational protection measures and these measures have been applied to the data affected by the personal data breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;

the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject referred to in paragraph 1 is no longer likely to materialise;

information would require a disproportionate effort. In such cases, the data subjects should be informed by means of publicly disclosed information or by a similar measure which ensures that the data subjects are informed in an equally effective manner.

(4) Where the controller has not yet notified the data subject of the personal data breach, the supervisory authority may, after having considered whether the personal data breach is likely to present a high risk, order the data subject to be informed or determine that one of the conditions referred to in paragraph 3 is met.

## VIII. THE PROCEDURE TO BE FOLLOWED AT THE REQUEST OF THE DATA SUBJECT

(1) LG Technologies Ltd shall facilitate the exercise of the data subject's rights, and shall not refuse to comply with a request to exercise the data subject's rights set out in this privacy notice, unless it proves that it is not possible to identify the data subject.

(2) LG Technologies Ltd. will inform the data subject of the action taken on the request without undue delay and in any event within one month of receipt of the request. If necessary, and taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The controller shall inform the data subject of the extension, stating the reasons for the delay, within one month of receipt of the request.

(3) If the data subject has made the request by electronic means, the information shall be provided by electronic means where possible, unless the data subject requests otherwise.

(4) If LG Technologies Ltd does not take action on the data subject's request, it will inform the data subject without delay, but at the latest within one month of receipt of the request, of the reasons for the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial remedy.

(5) LG Technologies Ltd. shall provide the data subject with the following information and measures free of charge: feedback on the processing of personal data, access to the processed data, rectification, integration, erasure, restriction of processing, data portability, objection to processing, notification of a personal data breach.

(6) Where the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may, taking into account the administrative costs of providing the information or information requested or of taking the action requested, charge a fee of HUF 5,000 or refuse to act on the request.

(7) The burden of proving that the request is manifestly unfounded or excessive lies with the controller.

(8) Without prejudice to Article 11 of the Regulation, where the controller has reasonable doubts as to the identity of the natural person making a request pursuant to Articles 15 to 21 of the Regulation, it may request additional information necessary to confirm the identity of the data subject.

#### IX. THE PROCEDURE TO BE FOLLOWED IN THE EVENT OF A PERSONAL DATA BREACH

(1) A personal data breach is a breach of security within the meaning of the Regulation that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

(2) A data breach is the loss or theft of a device (laptop, mobile phone) containing personal data, the loss or unavailability of a code to decrypt a file encrypted by the data controller, an infection by a ransomware virus that renders the data processed by the data controller inaccessible until the payment of a ransom, an attack on the IT system, the disclosure of an e-mail or address list containing personal data sent in error, etc.

(3) If a data breach is detected LG Technologies Ltd. representative will promptly conduct an investigation to identify the data breach and determine its possible consequences. The necessary measures will be taken to remedy the damage.

(4) You must notify the data protection incident to the competent supervisory authority without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it must be accompanied by the reasons justifying the delay.

(5) The processor shall notify the controller of the personal data breach without undue delay after becoming aware of it.

(6) The notification referred to in paragraph 3 shall include at least:

describe the nature of the personal data breach, including, where possible, the categories and approximate number of data subjects and the categories and approximate number of data subjects affected by the breach;

the name and contact details of the Data Protection Officer or other contact person who can provide further information;

explain the likely consequences of the data breach;

describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

(7) If and to the extent that it is not possible to provide the information at the same time, it may be provided in instalments at a later date without further undue delay.

(8) The data controller shall keep a record of the data breaches, indicating the facts relating to the data breach, its effects and the measures taken to remedy it. This record shall enable the supervisory authority to verify compliance with the requirements of Article 33 of the Regulation.

## X. PROVISIONS ON DATA SECURITY

### a) Principles for implementing data security

(1) LG Technologies Ltd. processes personal data only in accordance with the activities set out in this policy and for the purposes for which it is processed.

(2) LG Technologies Ltd. takes care of the security of the data, in this context, it undertakes to take all technical and organizational measures that are indispensable to enforce the laws, data protection and confidentiality rules on data security.

(3) The technical and organizational measures to be implemented by LG Technologies Ltd. will be aimed at:

ensure the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;

in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;

the use of a procedure to regularly test, assess and evaluate the effectiveness of the technical and organisational measures taken to ensure the security of processing,

(4) In determining the appropriate level of security, explicit account should be taken of the risks arising from the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

(5) LG Technologies Ltd. takes appropriate measures to protect the data against unauthorized access, alteration, disclosure, transmission, disclosure, deletion or destruction, accidental destruction or damage, and against loss of access due to changes in the technology used.

(6) LG Technologies Ltd. keeps the data it processes in accordance with the applicable laws, ensuring that the data is only disclosed to employees and other persons acting in the interests of LG Technologies Ltd. who need to know it in order to perform their job or duties.

(7) LG Technologies Ltd. stores the personal data provided in the course of each processing activity separately from other data, with the understanding that, in accordance with the above provision, the separate data files may only be accessed by employees with appropriate access rights.

(8) LG Technologies Ltd. grants access to personal data to employees who have agreed to comply with data security rules by giving a verbal or written confidentiality undertaking in relation to the personal data processed

(9) LG Technologies Ltd. takes into account the state of the art when determining and applying data security measures, and in the event of several possible data processing solutions, it will choose the solution that ensures a higher level of protection of personal data, unless this would imply a disproportionate level of difficulty.

#### b) Protection of LG Technologies Ltd. information technology records

(1) LG Technologies Ltd. will take the following necessary measures to ensure the security of its IT records:

Provide the data files it manages with permanent protection against computer viruses (using real-time virus protection software).

Ensure the physical protection of the hardware assets of the IT system, including protection against elemental damage.

Ensures that the IT system is protected against unauthorised access, both in terms of software and hardware.

Take all measures necessary to restore the data files, and implement separate, secure management of backups.

#### Protecting LG Technologies Ltd. paper records

(1) LG Technologies Ltd. takes the necessary measures to protect paper records, in particular with regard to physical security and fire protection.

(2) LG Technologies Ltd.'s officers, employees and other persons acting on behalf of LG Technologies Ltd. are required to keep secure all data media containing personal data that they use or possess, regardless of how the data is recorded, and to protect it against unauthorized access, alteration, disclosure, transmission, disclosure, deletion or destruction, and against accidental destruction or damage.

(3) LG Technologies Ltd. will only give keys to LG Technologies Ltd. offices to LG Technologies Ltd. managers, employees and other persons acting on behalf of LG Technologies Ltd.

#### XI. THE RULES ON DATA PROCESSING

(1) The rights and obligations of the data processor in relation to the processing of personal data are determined by the data controller within the framework of the law and the specific laws applicable to data processing.

(2) LG Technologies Kft. is responsible for the lawfulness of the instructions given to the processor in relation to the processing operations.

(3) LG Technologies Ltd. is obliged to inform the data subject about the identity of the data processor and the place of processing.

(4) LG Technologies Ltd. does not authorize the data processor to use any other data processor.

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