

PRIVACY POLICY

Information security and data protection is of outstanding importance to our company. This privacy policy details our commitment to protecting your personal data, in accordance with the legislation in force at all times.

I. Who will process your personal data?

Data controller:	Agro-Chemie Kft.	Agro-Chemie Kereskedő és Gyártó Kft.
Registered seat:	1225 Budapest, Bányalég utca 47-59.	1225 Budapest, Bányalég utca 47-59.
Tax ID:	14141351-2-43	14137499-2-43
Phone number:	+36 1 900 0800	
Email address:	info@agrochemie.hu	
Represented by:	Krisztián Fehér, managing director	

With regard to the data subjects, the data controllers **qualify as joint data controllers**, thus hereinafter the term „*data controller*” refers to both companies. Pursuant to Article 26 of the GDPR, the two data controllers have set out the allocation of their data protection obligations between themselves in a joint controller arrangement; upon request, our company makes the essence of this arrangement available to the data subjects at the contact details provided above.

II. General terms

2.1. What is personal data?

Any information that can be associated with you as a natural person (*not a business*) counts as personal data.

Such personal data is, for example, the name, the identification number, the location data, the online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

2.2. What is data processing?

Any operation or set of operations performed on the personal data described above, regardless of the procedure applied.

Examples include the collection, recording, registration, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure and destruction of personal data, as well as preventing their further use, the taking of photographs, audio or video recordings, and the recording of physical characteristics suitable for identifying a person (*e.g. fingerprint or palm print, DNA sample, iris scan*).

2.3. Who carries out such processing on your personal data?

Our company may process your personal data as a data controller.

A data controller is a business which, alone or jointly with others, determines the purpose of the processing of personal data and makes and implements the decisions relating to the processing (*or has them implemented by a data processor*).

Our company may engage data processors while processing your personal data.

A data processor is a person or business who or which processes personal data on behalf of, or under the instructions of, the data controller.

Such data processors may be, for example, the accountant, the auditor, the IT system administrator, etc.

2.4. What is the purpose of data protection and of this privacy policy?

The purpose of data protection regulation is for data controllers and data processors to process your personal data solely in compliance with the law in the course of their activities, to inform you appropriately thereof, and to be accountable for such compliance.

III. Why, how and for how long does our company process your personal data?

Purpose of processing	Description of processing	Types of personal data processed and their origin	Legal basis of processing	Duration of processing
Processing of job applications	<p>Our company processes the personal data contained in the directly received „<i>unsolicited</i>” CVs and in the CVs submitted for targeted, advertised positions, as well as in the other attached documents.</p> <p>The purpose of the processing is to notify the data subject of the job opportunities most suited to their qualifications and interests, to arrange an appointment with the data subject, and to conduct the selection procedure.</p>	<p>The personal data contained in the CVs and the other attached documents, contact details (<i>e-mail address, phone number</i>).</p> <p>Our company may review the public personal data, relevant to the performance of the work, that the applicant for the given position has published on social media sites (<i>no personal data is saved, stored or transmitted</i>).</p>	<p>The legal basis of the processing is the legitimate interest of our company [GDPR Art. 6. Sect. (1) Par. f)].</p> <p>You may obtain information about the legitimate interest test prepared for the processing relating to job applications via e-mail or in person at the office building.</p>	<p><u>In connection with an application for an advertised position</u>: in case of a successful application, the duration of the employment relationship; in case of an unsuccessful application, 1 (<i>one</i>) year following the selection, or until the data subject's request for erasure.</p> <p><u>In connection with an unsolicited CV</u>: 1 (<i>one</i>) year following the submission of the CV, or until the data subject's request for erasure.</p>
Inquiries, requests for quotations	<p>In connection with its business activities (<i>via the contact form on the website or on any other platform and in any other way</i>) our company processes the personal data contained in the questions, inquiries and requests for quotations received by it, as well as in those addressed by it to other businesses. The purpose of the processing is to answer the questions, inquiries and requests for quotations initiated by our company or received by our company, so that a contract may be concluded between the inquiring party and our company.</p>	<p>The personal data processed are any personal data that may be contained in the inquiries and replies, and beyond that, solely the personal data necessary for concluding the contract between the parties and for keeping in contact (<i>phone number, e-mail address</i>).</p> <p>The source of the personal data is the data subject.</p>	<p>The legal basis of the processing, if <u>a contract is concluded between the parties as a result of the request for quotation</u>, is the conclusion of the contract between our company and the contractual partner [GDPR Art. 6. Sect. (1) Par. b)]; if <u>no contract is concluded between the parties as a result of the request for quotation</u>, it is, thereafter, the legitimate interest of our company [GDPR Art. 6. Sect. (1) Par. f)].</p>	<p>If no contract results from the inquiry or request for quotation, the duration of the processing is 5 (<i>five</i>) years following the failure to conclude the contract, in accordance with the statutory provisions on limitation under the Civil Code.</p> <p>If a contract is concluded, the duration of the processing is as described below.</p>
Contracts, orders	<p>Our company processes the personal data contained in the contracts to be concluded and concluded in connection with its business activities. The purpose of the processing is the conclusion of the contract between our company and the contractual partner and its performance in accordance with the legislation in force at all times and with the contract.</p>	<p>The personal data processed are the data provided in the order and the contract, contact information (<i>phone number, e-mail address</i>), as well as the data necessary for issuing the accounting documents required under the Accounting Act.</p> <p>The source of the personal data is the data subject.</p>	<p>The legal basis of the processing is the conclusion and performance of the contract between our company and the contractual partner [GDPR Art. 6. Sect. (1) Par. b)].</p>	<p>The duration of the processing is 8 (<i>eight</i>) years following the performance of the contract, in accordance with the statutory provisions on the retention of accounting documents under the Accounting Act.</p>
Electronic surveillance	<p>At its registered seat, our company operates an electronic surveillance and recording system in the areas indicated by camera pictograms or warning notices (<i>monitored areas</i>). The camera system monitors the external parts of the registered seat.</p> <p>The purpose of the processing is the protection of persons and property.</p>	<p>The personal data processed are the image of the data subject present in the area monitored by the cameras; the camera system does not record sound.</p> <p>The source of the personal data is the data subject.</p> <p>The camera system is operated for our company by Gyémánt-2001 Kft. (registered seat: 2049 Diósd, Kavicsos dűlő 3594/8.; tax ID: 12666157-2-13) as a data processor.</p>	<p>The legal basis of the processing is the legitimate interest of our company [GDPR Art. 6. Sect. (1) Par. f)].</p> <p>You may obtain information about the legitimate interest test prepared in connection with the electronic surveillance via e-mail or in person at the office building.</p>	<p>The duration of the processing is at most 30 (<i>thirty</i>) days from the making of the recording, after which the recordings are deleted automatically.</p>

IV. Who may have access to your personal data?

Our company does not forward, sell or make your personal data available to third parties. Our company does not transfer your

personal data to third countries or to international organisations. We share your personal data with third parties only in accordance with this policy, as follows:

a) **Complying with legal obligations**

Our company may transfer personal data if such a measure is necessary to comply with any legislation, or if our company is obliged to do so by a decision or order of the competent authority or court. In this case the legal basis of the data transfer is the fulfilment of the legal obligation applicable to our company [GDPR Art. 6. Sect. (1) Par. c)].

b) **Enforcing our claims, demands and legitimate interests**

Our company may need to share personal data in order to protect the rights and interests of our company, in accordance with the applicable legislation (e.g. *criminal complaint, criminal proceedings, etc.*). In this case the legal basis of the data transfer is the legitimate economic interest of our company [GDPR Art. 6. Sect. (1) Par. f)].

c) **Using external service providers**

In the course of its operation, our company uses the services of third parties. The data processors engaged by our company may access your personal data, in accordance with the legislation in force at all times, only in a form and to an extent compatible with the purpose and legal basis of the processing, and only where absolutely necessary.

In connection with the above processing activities, our company uses the services of the following data processors: KITE Zrt. (registered seat: 4181 Nádudvar, Bem József u. 1.; tax ID: 10668586-2-09) – payroll and enterprise resource planning system; OnLiveIT Kft. (registered seat: 2370 Dabas, Bartók Béla út 90.; tax ID: 14098112-2-13) – implementation and operation of the SAP enterprise resource planning system; IT & Coffee Kft. (registered seat: 1239 Budapest, Kelep utca 60. 1.; tax ID: 13692335-2-43) – IT system operation; Predor Systems Kft. (registered seat: 1113 Budapest, Ábel Jenő utca 23.; tax ID: 25499878-2-43) – operation of the electronic access control system; Gyémánt-2001 Kft. (registered seat: 2049 Diósd, Kavicsos dűlő 3594/8.; tax ID: 12666157-2-13) – operation of the camera system; Imre Ügyvédi Iroda (registered seat: 1137 Budapest, Szent István krt. 18. II. em./13.; tax ID: 18470831-2-41) – legal advice, legal representation and drafting of documents. Our company has concluded a data processing agreement with the data processors in accordance with Article 28 of the GDPR. Our company does not transfer your personal data to any third country or to any international organisation.

V. How does our company protect your personal data?

a) **Security**

Our company has taken and takes appropriate technical and organisational measures to protect your personal data against loss or other forms of unlawful processing. In the course of its activities, our company makes every effort to comply with the best practices of information security. The protection of the personal data processed in the IT systems is detailed in our company's Information Security Policy (IBSZ), which sets out the rules of access management, logging, backup, encryption and physical protection.

b) **Confidentiality**

In the course of its business activities, our company undertakes an obligation of confidentiality towards its business partners, including the data processor indicated above, which extends to all information related to the contracts, including any personal data that may be processed.

VI. What rights do you have in relation to the processing carried out by our company?

6.1. The right to request information and the right of access

You may request information from our company in writing, asking us to inform you of:

- a) which of your personal data,
- b) on what legal basis,
- c) for what processing purpose,
- d) from what source,
- e) for how long we process them,
- f) and to whom, when, on the basis of which legislation, to which of your personal data we have granted access, or to whom we have transferred your personal data.

Our company complies with your request within at most 15 (*fifteen*) days, by electronic or postal mail sent to the contact details you provided, taking the following into account:

- a) Prior to complying with the request, our company may ask you to clarify its content and to precisely specify the requested information or processing activities.
- b) If your right of access under this point adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, we are entitled to refuse to comply with your request to the necessary and

proportionate extent.

- c) If you request the above information in multiple copies, we are entitled to charge a reasonable fee proportionate to the administrative costs of producing the additional copies.
- d) If our company does not process the personal data indicated by you, we are obliged to inform you of this in writing as well.

6.2. The right to rectification

You may request in writing that our company modify any of your personal data that is inaccurate, incorrect or incomplete. In this case we will specify or rectify the indicated personal data without undue delay, but no later than within 5 (*five*) days, and, where compatible with the purpose of the processing, supplement it with the additional personal data provided by you or with a statement attached by you to the processed personal data. We will notify you of all the above by electronic or postal mail sent to the contact details you provided.

Our company is exempt from the obligation of rectification if

- a) the accurate, correct or complete personal data are not available and you do not provide them to our company either, or
- b) the authenticity of the personal data provided by you cannot be established beyond doubt.

6.3. The right to erasure

You may request our company in writing to erase your personal data. You must submit your request relating to erasure in writing and must specify which personal data you wish to have erased and for what reason.

Our company refuses the request for erasure if

- a) a legal provision obliges our company to continue storing the personal data, or
- b) the processing by our company is justified by compelling legitimate grounds which override your interests, rights and freedoms.

If our company has no such obligation or no such compelling legitimate grounds, our company complies with your request within at most 15 (*fifteen*) days and notifies you of this by electronic or postal mail sent to the contact details you provided.

6.4. The right to restriction of processing

You may request in writing that our company restrict the processing of your personal data. During the period of restriction, our company, or the data processor engaged by it or acting under its instructions, may carry out, beyond storage, other processing operations on the restricted personal data only for the purpose of enforcing your legitimate interest or as provided by law. You may request the restriction of processing if

- a) you contest the accuracy of the personal data (*in which case the restriction applies for the period enabling our company to verify the accuracy of the personal data*);
- b) the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use,
- c) our company no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- d) you have objected to the processing (*in which case the restriction applies until it is established whether the legitimate grounds of the data controller override the legitimate grounds of the data subject*).

Where processing has been restricted, the personal data may, with the exception of storage, be processed only with your consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State of the European Union.

Our company will inform you in advance before the restriction of processing is lifted.

After complying with your request to exercise your right to restriction, our company will without undue delay inform the persons to whom your personal data have been disclosed, provided that this is not impossible or does not require disproportionate effort on the part of our company. Upon your request, our company will inform you of these recipients.

6.5. The right to object

If your data are processed on the basis of a legitimate interest, you must be provided with appropriate information in relation to the processing and with the possibility of exercising the right to object. Your attention must be expressly drawn to this right at the latest at the time of the first contact with you.

On this basis, you have the right to object to the processing of your personal data, in which case our company may no longer process the personal data concerned, unless it can be demonstrated that

- a) the processing by our company is justified by compelling legitimate grounds which override your interests, rights and freedoms, or
- b) the processing is related to the establishment, exercise or defence of the legal claims of our company.

6.6. The right to data portability

You have the right to receive the personal data concerning you that you have provided to our company in a structured, commonly used, machine-readable format (e.g. by e-mail), and also to have our company transmit these data directly to another data controller. When the right to data portability is exercised, our company complies with your request primarily by means of an e-mail attachment in .pdf format.

6.7. The right to legal remedy

6.7.1. Dispute resolution with our company

You may report your complaints and requests relating to the processing of your personal data to our company verbally (*in person*) or in writing (*by means of a document handed over in person or by another, or by post, or to an e-mail address*) at the contact details indicated in Section I, where the data controller is identified.

6.7.2. The right to lodge a complaint

If you have been unable to settle your complaints and requests relating to your personal data with our company in a satisfactory manner, or if at any time you consider that an infringement has occurred, or that there is a direct risk of such an infringement, in connection with the processing of your personal data, you are entitled to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

Contact details of the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság)

Registered seat: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf.: 9.

Telephone: +36 (1) 3911400; +36 (30) 683-5969; +36 (30) 549-6838

E-mail address: ugyfelszolgalat@naih.hu

Website: www.naih.hu

6.7.3. The right to turn to court (the right to bring an action)

You – *regardless of your right to lodge a complaint* – may turn to court if your rights guaranteed by the GDPR or the Privacy Act have been infringed during the processing of your personal data.

An action may be brought before a Hungarian court against our company, as a data controller having an establishment in Hungary.

You may also bring the action before the court having jurisdiction over your place of residence. In Hungary, the contact details of the courts are available at the following link: <http://birosag.hu/torvenyszekek>.

The legislation referenced in this privacy policy:

- a) **GDPR:** Regulation of the European Parliament and of the Council (EU) 2016/679 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)
- b) **Privacy Act:** Act CXII of 2011 on Informational Self-Determination and Freedom of Information
- c) **Civil Code:** Act V of 2013 on the Civil Code
- d) **Accounting Act:** Act C of 2000 on Accounting