

PRIVACY NOTICE

In this Privacy Notice, **IK Közterületi Kft.** (registered office: 1126 Budapest, Kléh István utca 9. II. floor, door 5; company registration number: 01-09-272694; tax number: 25395389-2-43; e-mail: info@ikoutdoor.hu; hereinafter: “**Data Controller**”) informs you about which personal data are processed or handled in connection with the use of the Data Controller’s website (hereinafter: “**Website**”).

This Notice sets out the following:

- the types of personal data we collect and in what ways,
- information on how we collect them,
- how we use your personal data,
- an explanation of when and for what purpose we share and/or transfer personal data.

1. Definitions

- **Data processing:** all processing operations carried out by a data processor acting on behalf of or under the instructions of the data controller.
- **Data processor:** any natural or legal person, or organisation without legal personality, who — within the framework and conditions set out in law or in a binding legal act of the European Union — processes personal data on behalf of or under the instructions of the data controller.
- **Data processing (general):** any operation or set of operations performed on data, regardless of the method applied, including in particular the collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, restriction, deletion and destruction of data, as well as preventing further use of the data; the creation of photographic, audio or video recordings; and the recording of physical characteristics suitable for identifying a person (e.g. fingerprint, palm print, DNA sample, iris image).
- **Restriction of processing:** the marking of stored personal data with the aim of limiting its future processing.
- **Data controller:** any natural or legal person, or organisation without legal personality, who — within the framework set out in law or in a binding legal act of the European Union — independently or jointly with others determines the purposes of data processing, makes and implements decisions regarding the processing (including the tools used), or has them implemented by the data processor.
- **Data transfer:** making data accessible to a specified third party.
- **Data deletion:** rendering data unrecognisable in such a way that its restoration is no longer possible.

- **Data protection incident:** any breach of data security that results in the accidental or unlawful destruction, loss, alteration, unauthorised transmission or disclosure of personal data, or unauthorised access to such data.
- **Identifiable natural person:** a natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the person.
- **Recipient:** any natural or legal person, or organisation without legal personality, to whom personal data are made accessible by the data controller or the data processor.
- **EEA state:** a Member State of the European Union and any other state that is party to the Agreement on the European Economic Area, as well as any state whose citizens enjoy the same legal status as citizens of EEA states under an international agreement concluded between the EU, its Member States, and a non-EEA state.
- **Data subject:** any natural person who is identified or identifiable based on any information.
- **Third country:** any state that is not an EEA state.
- **Third party:** any natural or legal person, or organisation without legal personality, who is not the data subject, the data controller, the data processor, or persons authorised to process personal data under the direct authority of the controller or processor.
- **Consent:** the data subject's voluntary, explicit and informed declaration of will, by which the data subject indicates — by a statement or by a clear affirmative action — that they agree to the processing of personal data relating to them.
- **Disclosure:** making data accessible to anyone.
- **Personal data:** any information relating to the data subject — in particular the data subject's name, identification mark, and one or more characteristics relating to their physical, physiological, mental, economic, cultural or social identity — as well as any conclusion that can be drawn from such information about the data subject.
- **Objection:** any statement made by the data subject in any way (e.g. verbally, in writing, or by e-mail) in which they oppose the processing of their personal data and request the termination of processing or the deletion of the processed data.

2. General Data Processing Purposes Arising from the Use of the Website

2.1 Data Processing Related to Contacting the Data Controller (Requesting a Quote)

Scope of personal data processed: The data subject's name, company-related information, telephone number, the content of their message, email address, as well as any other information the data subject provides to the Data Controller during the contact process. The scope of processed personal data depends on the method of contact and on the personal data included in the inquiry. The Data Controller only processes the personal data collected during contact to the extent necessary to provide a response to the inquiry.

Legal basis for data processing: The Data Controller's legitimate interest under Article 6(1)(f) of the GDPR, against which the data subject has the right to object.

Purpose of data processing: To enable communication with the Data Controller and to allow inquiries regarding the Data Controller's business activities and services.

Duration of data processing: If no other legal basis applies to the processing of the personal data provided by the data subject (e.g. fulfilment of contractual obligations applicable to the Data Controller), the personal data provided by the data subject will be deleted 30 days after the first message or initial contact.

Method of data storage: electronic.

Data transfer: No data transfer takes place.

Automated decision-making: No automated decision-making is carried out.

3. Data Processing and Operations Arising from Use of the Website

3.1 Requesting a Quote

The Company enables Data Subjects to request a quote from the Company by providing the data detailed below. If the quote is accepted, a contract is concluded between the Company and the Data Subject requesting the quote.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
Requesting a quote for using the Company's services; concluding a contract, payment, invoicing, maintaining contact, and sharing information related to the service.	Preparing a quote prior to entering into a contract and assessing customer needs. The processing is necessary for taking steps at the request of the Data Subject prior to entering into a contract, or for the fulfilment of a contract between the Data Subject and the Company (GDPR)	Data related to requesting a quote: name, email address, telephone number, and any other personal data provided by the Data Subject. Data related to contract formation, contract fulfilment, and invoicing: name, address, email address, telephone number, name of contact person. Billing data: name, address, tax number, tax identification code.	In the case of a quote: 1 year after the expiry of the quote's validity period. If a contract is concluded following the quote request: 10 years after the termination of the contract. Invoice data are retained for 8 years	At the same time as the quote request.

	Article 6(1)(b)). For issuing and retaining invoices: Section 169(2) of Act C of 2000 on Accounting.		from the date of issue.	
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Please note: If the above-mentioned data are not provided, the Company is unable to fulfil the request for a quote or enter into a contract.

3.2 Fulfilment of Contracts, Shipping

If the Company enters into a contract with any individual, the data processing is based on the legal ground of contract fulfilment.

In the course of fulfilling the contract, personal data may be transferred to a data processor.

During the delivery of orders, the Company may use the services of subcontractors.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
During the delivery of the work, managing the personal data of natural persons contracting with the Company — customers, buyers, suppliers — in connection with the contractual relationship, particularly for keeping records of orders, fulfilling orders, and performing the contracted services.	Contract fulfilment (GDPR Article 6(1)(b))	Name, address, telephone number, email address of the data subjects.	For 10 years after the termination of the contracts.	At the time of entering the contract, as part of the mandatory provisions included in the contracts.

Please note: If the above-mentioned data are not provided, the Company is unable to enter into a contract.

3.3 Data Processed During Contact

If, while using the Services, the Data Subject has a question, encounters a problem, or initiates contact for any other purpose, they may get in touch with the Company using the contact details provided in this Notice or the contact information available under the “Contact” menu item on the website.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
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Informing Data Subjects regarding the questions and comments raised during contact; ensuring the retrievability of the information exchanged during the contact process.	The Data Subject's consent (GDPR Article 6(1)(a))	Name, company name, country, email address, telephone number, subject of the inquiry, date and time of contact, and any additional personal data provided in the message.	Until the Data Subject withdraws their consent, but no later than the last day of the year following the contact.	At the time of contact.
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3.4 Processing the Data of Natural Persons as Contracting Partners

If the Company enters into a contract with a natural person or a sole trader, the data processing is based on the legal ground of contract fulfilment. For the purpose of fulfilling the contract, the individual's personal data may be transferred to a data processor. During the fulfilment of orders, the Company may also use the services of additional subcontractors.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
Entering and fulfilling the contract, business communication.	Contract fulfilment and compliance with legal requirements (GDPR Article 6(1)(b))	Name, place and date of birth, mother's name, address, tax number, sole entrepreneur licence number, personal identification document number, telephone number, email address, bank account number.	10 years following the termination of the contract.	At the time of concluding the contract, as part of the mandatory provisions included in contracts.

Please note: If the above-mentioned data are not provided, the Company is unable to enter into a contract.

3.5 Contact Details of Natural Person Representatives of Legal Entities as Contracting Partners

If the Company concludes a contract with a legal entity, the Company processes the personal data of the contracting partner's representative or the employee designated for communication, to the extent necessary for maintaining contact.

The data processing is based on the legal ground of contract fulfilment.

In the course of fulfilling the contract, the representative's personal data may be transferred to a data processor.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
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Fulfilment of the contract, business communication.	Contract fulfilment (GDPR Article 6(1)(b))	Name, address, telephone number, email address of the natural person representative.	For as long as the individual acts as a representative/contact person.	At the time of concluding the contract, as part of the mandatory provisions included in the contracts.
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Please note: If the above-mentioned data are not provided, the Company is unable to enter into a contract.

3.6 Handling complaints

If the Data Subject has any objection or complaint regarding the Company's services, the following conditions apply to the related data processing:

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
Handling quality-related complaints concerning the services provided by the Company.	Statutory requirement: Act CLV of 1997, Section 17/A (7)	Name, address, name of the service, date of purchase and date of complaint submission, description of the complaint.	For complaint records and copies of written responses: 3 years.	At the time of entering the contract.

Please note: If the above-mentioned data are not provided, the Company is unable to handle complaints.

3.7 Newsletter and Direct Marketing Activities

To enhance its economic activity, for advertising purposes, and to support maintaining communication with Data Subjects, the Company provides newsletters and conducts direct marketing activities to promote sales.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
Enhancing the Company's economic activity, sending electronic messages containing advertisements to Data Subjects, providing information on current updates, and maintaining communication.	The Data Subject's consent (GDPR Article 6(1)(a))	Name, address, telephone number, email address of the Data Subjects. For companies: company name and contact person.	Until the Data Subject withdraws consent, i.e., until unsubscribing..	At the time of subscribing to the newsletter.

3.8 Facebook, LinkedIn és other social media platforms

To enhance its economic activity, the Company may communicate on social media platforms and publish professional or other content.

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
Sharing useful professional news, information, and insights on the Company's Facebook and LinkedIn pages related to the Company's services and activities.	The Data Subject's implied consent, expressed by liking or following the Company's Facebook/LinkedIn page, liking or commenting on posts, or contacting the Company through the platform. (GDPR Article 6(1)(a))	The name provided by the Data Subject on Facebook/LinkedIn (which may be a real name, a fictitious name, or a name derived from the real name), as well as any other publicly available (i.e., made public) data on the profile.	Data are processed through the social media platforms; therefore, the duration of processing and deletion is governed by the rules of the respective social media provider.	Upon entering the Company's social media page.

Please note: Facebook, LinkedIn, and other social media companies act as independent data controllers. Their own privacy notices and cookie policies are published on their respective platforms.

3.9 Data Processing Related to Recruitment and CVs

Purpose of Data Processing	Legal Basis for Data Processing	Scope of Processed Data	Duration of Data Processing	Time of Providing Information
Searching for new employees, recruitment, posting job advertisements, receiving and storing job applications, pre-screening applicants, conducting interviews, and handling CVs. <u>CVs:</u> The Company processes the personal data of natural persons applying for job positions from the beginning of the recruitment process. The purpose of recruitment is to optimise staffing levels and employ workers with appropriate competencies. The Data Controller keeps certain personal data of the Data Subject for	The Applicant, as Data Subject, gives consent to data processing related to recruitment (GDPR Article 6(1)(a)). By providing their personal data, and by registering or submitting an application, the Data Subject consents to the processing of their personal data.	- Personal data included in the CV, in particular: - name - address - photograph - date of birth - place of birth - personal preferences - educational background - username (on the Career Page) - password (on the Career Page) - email address - telephone number - Skype name - LinkedIn identifier - Facebook identifier - name of reference person verifying work experience - telephone number of reference person - name of employee referring candidate - ID of employee referring a candidate	The Company stores incoming CVs electronically on its mail server until the Data Subject withdraws consent, or until the advertised position (recruitment procedure) is filled, but no later than 1 year after the advertisement.	At the time of recruitment or posting the job advertisement, or in the absence of these, at the time of offering the position. At the time of registration, or at the moment the data or information is provided.

identification within the Career Page, for operating the recruitment process, and for maintaining contact with the Applicant				
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4. Data Processing Arising from Use of the Website

4.1 Processing Data with Cookies and Log Files

By visiting the Company's Website, all Users consent to the use of cookies managed by external service providers for recording data and information, based on GDPR Article 6(1)(f). Such data include information generated by the User's computer during use of the Website, which cookies automatically record as part of technical processes. These automatically recorded data are logged by the system—without any separate declaration or action by the User—upon entering or leaving the Website.

These data are not combined with other personal user data, meaning the User cannot be identified based on them. Only the external service providers managing the cookies and the Data Controller have access to these data.

The Data Controller uses only external service providers' cookies (Google, Facebook) on the Website. Cookies are short text files sent by the Website to the User's computer hard drive, containing information related to the User. The Company uses cookies, for example, to recognise the user or track their browsing habits. The information obtained may also be used to compile and analyse statistics related to Website usage, and to forward such non-identifiable statistical data (e.g. number of visitors, most viewed topics or content) to third parties or publish them in aggregated, anonymous form. This is an important interest for optimising the Website and improving the user experience. Both session cookies (deleted at the end of browsing) and persistent cookies (stored on the User's device for a certain period) are used. The Data Subject may delete cookies at any time in their browser. The browser can also be set to accept cookies selectively or disable them entirely or only for certain websites.

For further information on processing personal data with cookies, please consult the Google Analytics Privacy Policy.

In accordance with GDPR Article 6(1)(f), the Company's Website also uses log files, which store access data each time the site is visited. Stored log records include: the Data Subject's IP address, date and time of access, status, the request sent by the browser to the server, the amount of data transferred, the page from which the Data Subject accessed the desired page (referrer), browser product and version, operating system, and country information. Log data are routinely and irreversibly deleted after 30 days. Temporary storage serves solely to protect the Website against attacks and misuse. This storage is an essential interest; log data are not used for any other purpose.

The Website may contain information—particularly advertisements—from third parties or advertising providers not associated with the Website's Data Controller. These third parties may also place cookies or web beacons on the user's computer or use similar technologies to collect

data in order to send targeted advertising messages related to their own services. In such cases, the data processing is governed by the privacy policies of those third parties, and the Company assumes no responsibility for such processing.

4.2 Google Analytics

In accordance with GDPR Article 6(1)(f), the Company's Website uses Google Analytics, a web analytics service provided by Google Inc., headquartered in the USA ("Google").

Google Analytics uses cookies - text files placed on the computer—to help track how Data Subjects (users) use the Website.

Information generated by the cookie about Website usage is transmitted to and stored on servers located in the USA.

The European Commission's Implementing Decision (EU) 2016/1250 of 12 July 2016 allows data transfers from controllers or processors in the EU to organisations in the USA that have committed to the EU-US Privacy Shield principles. Google is committed to these self-certification principles of the US Department of Commerce. If IP anonymisation is activated on the Website, Google shortens the IP address within EU Member States or other EEA countries before transferring it to the USA. Only in exceptional cases is the full IP address sent to Google's US server and shortened there.

IP anonymisation is active on this Website. Google uses this information on our behalf to analyse Website usage, compile activity reports, and provide other services related to Website and Internet usage. Analysing user behaviour is an important interest of ours for optimising the Website and advertisements.

Users may disable cookies by adjusting their browser settings. Users may also prevent Google from collecting and processing data generated by cookies (including IP address) by downloading and installing the browser plug-in available at:

<https://tools.google.com/dlpage/gaoptout?hl=en-GB>

Cookies must be configured separately in each browser in which the User wants to disable tracking by Google Analytics, because if the user deletes the opt-out cookie or the opt-out cookie expires, Google Analytics tracking may resume.

Further privacy information is available at:

<https://www.google.de/intl/en/policies/privacy/>

5. Your Rights Regarding Data Processing

As a Data Subject, you may request information about the processing of your personal data, request correction, erasure (except where processing is mandatory), withdrawal, exercise your right to data portability, and your right to object, in a way indicated at the time of logging your data, and by using the contact details provided in Section I of this Privacy Notice.

Under GDPR Articles 15–20, you have the following rights:

- a) right to information
- b) right of access

- c) right to rectification
- d) right to erasure
- e) right to restriction of processing
- f) right to data portability
- g) right to object

You may exercise your rights by sending a request to the Data Controller's contact details.

Right of Access

You may request confirmation of whether your personal data are being processed, and if so, access the data and receive information about security measures.

Right to Rectification

Upon request, we will correct inaccurate personal data and complete incomplete data without delay.

Right to Erasure

We will delete your personal data without undue delay if:

- the data are no longer needed for the purpose collected or they will be managed in a different way,
- you withdraw consent and no other legal basis applies,
- the data were processed unlawfully,
- deletion is required by law.

We cannot delete data if processing is necessary for legal claims.

Right to Object

You may object at any time to processing based on your personal situation.

Right to Restriction of Processing

Upon request we will restrict processing, after which we will only use personal data in a specific way. You are entitled to request restriction of processing if any of the following conditions apply:

- you contest accuracy (restriction lasts until verification),
- processing is unlawful and you request restriction instead of deletion,
- the controller no longer needs the data but you require them for legal claims,
- you object to processing (restriction lasts until legitimate grounds are assessed).

Right to Data Portability

If it does not infringe others' rights, we will provide your data in a structured, commonly used, machine-readable format or transfer them directly to another controller.

Right Not to Be Subject to Automated Decision-Making

You have the right not to be subject to decisions based solely on automated processing—including profiling—that significantly affect you, except where necessary for a contract, authorised by law, or based on explicit consent.

Right to Lodge a Complaint

You may lodge a complaint with the Hungarian Data Protection Authority (NAIH):

Address: 1055 Budapest, Falk Miksa utca 9–11.

Mailing address: 1374 Budapest, Pf. 603

Phone: +36-1-391-1400

Email: ugyfelszolgalat@naih.hu

Website: www.naih.hu

You may also turn to the court competent for your residence or place of stay.

Informing the Data Subject About a Data Protection Incident

If a data protection incident is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller will inform the Data Subject without undue delay. The notification must clearly describe: the nature of the incident, contact details of the data protection officer or other contact person, likely consequences, measures taken or proposed to address the incident, including mitigation steps.

No notification is required if:

- adequate technical and organisational protection (e.g. encryption) was applied, especially measures designed to make data unintelligible to unauthorised persons,
- subsequent measures ensure that high risk is no longer likely in the future,
- notification would require disproportionate effort (in such cases, public communication is required).

If the Data Controller has not yet notified the Data Subject, the supervisory authority may order notification after assessing the risk.

Reporting a Data Protection Incident to the Authority

The Data Controller must report the incident to the competent supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of it, unless the incident is unlikely to pose a risk to individuals' rights and freedoms.

If reporting is delayed beyond 72 hours, reasons for the delay must be provided.

Data Controller
IK Közterületi Kft.