

DATA MANAGEMENT POLICY

The sites www.ermico.hu and www.iparimegoldasok.hu (hereinafter referred to as "the Website") are operated by **Ermico Limited Liability Company** (registered by the Company Registry Court of Budapest - Metropolitan Court, company registration number: Cg.01-09-278538; tax number: 22632614-2-42; registered seat: 137 Szentmihályi Road, 1152 Budapest; bank account: Budapest Bank: HU36-10102103-85409600-01004005; phone number: +36 20 266 1111; e-mail address: ermico@ermico.eu), which business organization respects the constitutional fundamental right to the protection of personal data, acknowledges that everyone disposes over the disclosure and use of its personal data.

Ermico Ltd., as a data controller, has its registration number of data management needed to manage databases related to the operation of web pages as follows: **NAIH-119366/2017**. (National Authority for Data Protection and Freedom of Information)

The legal basis of data management

The Data Controller records the following pursuant to Act CXII of 2011 on Information Self-determination and Freedom of Information, Act VI of 1998 Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, concluded at Strasbourg dated 28 January 1981, Act CXIX of 1995 on the Management of Name and Address Data for Research and Direct Marketing Purposes, Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Services, Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities and the requirements of other applicable Hungarian legislation on data management, as well as taking into consideration the data protection practices developed by the Data Protection Commissioner, as outlined below.

Ermico Ltd. (hereinafter referred to as "the Data Controller") defines in the present policy its principles and practices of managing and protecting the personal data disclosed by visitors on the Website or during other activity, legitimately disclosed to them.

By using the Website, you agree to the terms and conditions contained in this policy and voluntarily agree at your registration and / or making a request that Ermico Ltd. shall manage your data regarding this request.

The purpose of data management

The Data Manager performs data management solely for the purpose of managing transmitted requests and orders, executing deliveries, related billing and any other actions requested by the user (e.g. sending a newsletter), as well as for conducting market research and direct marketing for those involved. The data of those concerned that are already registered by the Data Controller will be updated on any subsequent contacting.

The designation of data management

The Website is usually available free of charge and without the need to enter personal information. However, to access certain parts of the Website or to use some of the services offered by the Website, registration or entering your personal information (e.g. name, e-mail address, phone number, etc.) is

required. We request and store the information provided solely for completing your inquiries, quotations, orders. Data provision during any registration on the Website is always voluntary; the visitor can freely choose whether to provide the requested data. Data handling for persons registered on the Website only takes place on the basis of adequate information based on this policy and on their voluntary, clear and explicit consent.

The term of data management

The Data Controller manages the personal data while the purpose of the data management exists. At the end of the purpose of data management, personal data will be deleted immediately at the request of the person concerned.

Information and consent

In all cases, prior to recording personal data the person concerned will be provided with the prior and appropriate information in respect of the handling of the personal data provided and a prior, clear and explicit consent to the data management based on the information will be obtained. The information shall cover the voluntary nature of the data supply, the scope of the data to be processed, the purpose, the term of the data management, the disclosure of the data controlling and any data processing person.

The rights of visitors to manage their personal data

The visitors can request information about the management of their personal information. The Data Controller informs the Person concerned about the personal data it handles, the purpose, legal basis, term of the data management, the data processor's name, address (registered seat) and activities related to data management. The request for information regarding www.ermico.hu and www.iparimegoldasok.hu pages shall be sent to the address ermico@ermico.eu. Upon request of the person concerned, the Data Controller shall respond in writing within 30 (thirty) days at the latest.

The person concerned shall be entitled to ask for the rectification of personal data, by denoting appropriate data. This request can be sent to the Data Controller's electronic address (regarding www.ermico.hu and www.iparimegoldasok.hu to ermico@ermico.eu). The Data Controller shall immediately carry out the rectification and shall notify the person concerned in writing of this.

The person concerned is entitled to request the deletion of its personal data (i.e. withdraw its declaration of consent to the handling of its personal data). Deletion of personal information can be requested by e-mail addresses of the concerned Websites or by post: **Ermico Ltd. 137 Szentmihályi Road, 1152 Budapest.**

The person concerned may, at any time, revoke its consent, without justification, in whole or in part. The Data Controller shall immediately, following the receipt of a notice of revocation of consent, terminate the data management, permanently delete the person concerned of its records. The personal data concerned by the withdrawal shall be deleted in such a way that the person making the withdrawal declaration can be clearly identified and finally, the Data Controller shall notify the person concerned of all the above events.

The person concerned may seek for legal remedy in the case of breach of its rights related to its personal data. A user, who feels that its rights to personal data privacy were violated, may apply to a civil court or request the assistance of the Data Protection Commissioner. Detailed legal provisions on this and on the Data Controller's obligations are contained in Act CXII of 2011 on Information Self-determination and Freedom of Information.

Those registering their personal data on www.ermico.hu and www.iparimegoldasok.hu websites clearly consent and expressly accept that their personal data will be handed over by the Data Controller to a third-party data processor for carrying out the technical actions necessary for the processing of data.

The Data Controller shall not transfer personal data to third parties without the prior consent of the person concerned in the absence of any such authorization. However, this does not apply to any mandatory statutory data transfers. Prior to the execution of official requests for data, the Data Controller examines for each data that the legal basis for the transfer of data is indeed valid.

The www.ermico.hu and www.iparimegoldasok.hu websites cooperate with the competent authorities. The Data Controller will send any electronic newsletter or mobile phone text message to the electronic mail address or mobile phone number provided by the claimant in the sole case of the volunteer, prior, clear and explicit consent at the time of the registration and by having obtained adequate information.

Data security

The Data Controller shall take all necessary measures to ensure the safe and undamaged management of the data and the deployment and operation of the necessary data management systems. The Data Controller shall ensure that no unauthorized person has access to, discloses, transmits, modifies or deletes the data processed. The data processed will only be recognized by the data controller or the employees of the person concerned and will not be handed over by the Data Controller to third parties who do not have authority to recognise the data. Data is stored on a Hungarian server.

The Data Controller will do its utmost to ensure that the data are not accidentally damaged or destroyed. The Data Controller also specifies the above commitment to its employees participating in the data management activity.

In any event, the Data Controller does not collect any particular data, i.e. data that relates to racial origin, membership of a national or ethnic minority, political opinions or party affiliations, religious or other beliefs, representation of interests, health status, harmful passion, sexual life or criminal record. If the Data Controller becomes aware that a user placed data qualifying as particular pursuant to Avtv. in the database, it shall immediately delete it and have the right to cancel the registration of the person concerned.

The Website

The content of the Website is for information purposes only. The content of the Website is the intellectual property of the Data Controller, which cannot be used in any form without the prior written permission of the Data Controller. The Website may also include links to websites operated by third parties. Content on such websites is not under the influence of the Data Controller.

Some parts of the Website, in order to identify you, use small data files, so-called "cookies", which are stored on your computer. The browser program allows you to allow or block cookies, but please note that without using cookies you may not be able to use all the features of the Website. On the Website, the visitor computer's Internet address ("IP Address") is logged to record, which data is stored for statistical purposes only. The data in the log file will not be linked to other personal information that will allow you to be personally identifiable. For further inquiries or remarks, please contact the operator's staff at the following email addresses: (ermico@ermico.eu regarding www.ermico.hu and www.iparimegoldasok.hu)

Scope and modification of the Data Management Policy

The scope of this Policy applies to the Data Controller and all data acquired and processed by the Data Controller in the course of its activity. The Data Controller reserves the right to unilaterally modify this Data Management Policy with prior notice to visitors. You accept the modified data management policy by using the service after the change has taken effect. This revised Data Management Policy will enter into force on 14 December 2017.

Contact:

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Phone: +36 20 266 1111
E-mail: ermico@ermico.eu

Our supervisory bodies and remedies:

Budapest Conciliatory Council
3rd Floor, 310, 99 Krisztina Bvd., 1016 Budapest, Hungary
Correspondence address: 1253 Budapest, PO Box 10.
E-mail address: bekelteto.testulet@bkik.hu
Fax: +36 (1) 488 21 86
Phone: +36 (1) 488 21 31

National Authority for Data Protection and Freedom of Information (NAIH)
22/c Szilágyi Erzsébet Alley, 1125 Budapest, Hungary

Head Office of the Budapest Capital, Technical, Licensing and Consumer Protection Department, Consumer Protection Department
Address: 7 Városház Str., 1052 Budapest, Hungary
Postal address: 1364 Budapest, PO Box 144.
Phone number: +36-1 450-2598
E-mail: fogyved_kmf_budapest@nfh.hu

Notary of the Mayor's Office Budapest District 15
Address: 1-3 Bocskai Street, 1153 Budapest, Hungary
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