

# **Legal declaration**

## **General rules**

By accessing and using the website of VPI Kft. the user actively consents to the general data processing described in the "Data Processing Agreement" and expressly acknowledges and complies with the legal and Data Processing Agreements described below. The user provides its expressed consent to the area specific data processing by ticking the checkbox preceding the given data processing, which is regulated in this "Data Processing Agreement".

## **Copyright**

The website of VPI Kft. is protected by copyright. The owners or authorized users of VPI Kft's website are entitled to act as authors of any text, image, sound, proprietary software and other material on the website by managing, reproducing or modifying those. Under restrictions, these rights may be transferred to a third party also. VPI Kft's website may be read, have its content extracted by copying or by printing, downloading it to a mass storage or transmitting it to another person, but in all cases solely for personal, informative purposes and not for commercial use. It is forbidden to sell or transmit copies of any part of the website for commercial benefit! It is also forbidden to change any part of the website or to incorporate it into any other work, publication or website, whether in electronic or traditional form.

All products published on the website are VPI Kft.'s own products protected by copyright. The sole manufacturer of these products is VPI Kft. A design patent registered with the European Union Intellectual Property Office (EUIPO) protects these products. Their unauthorized use and copying shall have legal consequences.

## **Contact of the website**

The information on the website has been posted in good faith, but for informative purposes only. VPI Kft does not guarantee the accuracy and completeness of this information, they only serve for orientation, therefore no other purposes shall be established on these. Neither VPI Kft., nor their employees or agents are liable for any losses, damages or costs (including, without limitation, any foregone profit, indirect, collateral or consequential losses) arising from accessing or using the website of VPI Kft. VPI Kft. reserves the right to change or correct the content of the website at any time when it deems necessary without prior notice.

## **Linked websites**

VPI Kft.'s website may contain interfaces (so called hyperlinks) providing automatic connection to other web sites. These related websites are owned and managed by third parties. VPI Kft. only provides access to the related websites, but neither does VPI Kft. nor its employees or agents undertake any obligation or liability of any nature, for information displayed on those websites, even if they were reviewed or approved by an employee or agent of VPI Kft.

# Data protection and data processing Information

## 1.) General information

VPI Kft., as the operator of the website accessible under the domain name <http://vpi.hu/hu/> and as data controller hereby publishes information on data processing performed and the services provided in connection with the website.

VPI Kft. respects and protects the personal data of its website's visitors and makes every effort to ensure that the data provided by the visitor is treated with the utmost certainty, ensure its integrity, prevent from compromising and ensure that it does not come to the attention of unauthorized third parties. Such personal data shall be accessible solely by those employees of VPI Kft. who are designated controllers of the data indicated and only to the extent necessary to perform their duties. In order to protect personal data collected on the Internet, VPI Kft. takes responsibility for the safe handling of personal data voluntarily transferred.

VPI Kft. shall not be responsible for the data processing of the websites connected via hyperlink with VPI Kft's website.

## 2.) Data processor

**Data processor:** VPI Kft  
**Seat:** H-1029 Budapest, Nádasdy Ferenc utca 4. Hungary  
**Registry number:** 01-09-907399  
**Represented by:** Varga Péter István CEO  
**Contacts:** e-mail: [info@vpi.hu](mailto:info@vpi.hu) Tel.: +36 (1) 789-7966  
**Correspondence:** H-1116 Budapest, Fehérvári út 132-144., Hungary  
**Data protection officer:** **László Vince**  
**Data processing e-mail:** [info@laszlovince.hu](mailto:info@laszlovince.hu)  
The website is developed and kept up-to-date by the employees of the company.

## 3.) Data recording

The information on the website are accessible without providing any personal data.

VPI Kft. solely collects and processes personal data provided voluntarily by the visitors of its website. VPI Kft. handles voluntarily provided personal data (such as name, address, phone number or email address) to secure and improve the services provided by and to achieve the goals set out in this Privacy Policy.

VPI Kft. processes, uses and stores personal data with voluntary, definite and explicit consent of the individual, in accordance with legislation currently in force. Should the authorisation to process personal data be revoked, VPI Kft. shall delete personal data before the expiry of the available term set out in the applicable legislations.

## 4.) Modification, updating and deletion of personal data

Individuals may request information about their personal data handled by VPI Kft. without any time restriction. If necessary, personal data may be updated, modified free of charge without any restriction or reasoning, or request deletion from the database if the reason for data collection expires or the consent is revoked by sending the request per post or per e-mail to the following address:

Address: VPI Kft., H-1116 Budapest, Fehérvári út 132-144., Hungary  
E-mail address: info@vpi.hu

## **5.) Legal provision for personal data processing**

The data processing related to the content of the website <http://vpi.hu/hu> is carried according to the voluntary declaration of the user based on a extensive and comprehensive information according to legal provisions in force. This declaration contains the user's explicit consent to have its personal data processed, that was shared while using the website.

The legal basis for data processing are Section 5 Point (1)a of Act CXII of 2011 on Informational Self-Determination and Freedom of Information about the voluntary consent of the User and Regulation (EC) No 2016/679 of the European Parliament and of the Council (General Data Protection Regulation - GDPR).

User gives his consent on a voluntary basis in respect of each data processing by using the website or by clearly accepting each data processing concerned by means of a selection field.

Users shall only enter their own personal data on the website or at the contacts indicated on the site. Should they provide other than their own personal data, it is the obligation of the data provider to obtain the consent of the User.

The data controller guarantees that the consent will be lawfully obtained for the processing of personal data made available of a third party natural individual during service provided (e.g. sending an article, publishing user-generated content, etc.).

## **6.) Employment vacancies, recruitment**

Purpose of data management: effective facilitation to find employment for and to provide presence on the labour market to the User, as well as to facilitate the contractual performance of VPI Kft by the right amount of employees with the proper knowledge.

Legal basis for data processing: voluntary consent of the applicant.

VPI Kft. uses mainly its on website and Facebook page for recruitment, but may use advertising pages as well.

Retention period: VPI Kft stores the applications received until the start of employment, but for a maximum of 30 days, unless the applicant expressly requests (consents) to have it kept longer, in which case the application is stored until the date indicated in the application, but for a maximum of 1 year.

On advertising platforms independent of VPI Kft., the owner and operator of the advertising platform fully complies with the data management policy established by the owner and operator of the advertising platform and stores the applications received until the start of employment, but for a maximum of 30 days, unless the applicant expressly requests (consents) to have it kept longer, in which case the application is stored until the date indicated in the application, but for a maximum of 1 year.

## **7.) Cookies**

Anonymous visitor identifiers (hereinafter referred to as cookies) are files or fragments of information that are stored on the Users computer (or other internet-enabled device: smart phones, tablets) when the User visits the <http://vpi.hu/hu> website. A cookie usually contains the name of the site, its own "lifetime"

- that is, how long it stays on the device - and its value, which is usually a randomly generated unique number. The <http://vpi.hu/hu> only handles session cookies necessary for the operation of the site, which are deleted after the site is left. The site does not use any analytical and convenience cookies.

Type of cookies: session cookies

Legal basis for data processing: provisions of Section 13/A Point 3 of Act CVIII of 2001 on Certain Aspects of E-commerce Services and Information Society Services

Purpose of data management: Ensuring the proper functioning of the website

Duration of data processing: Until the end of the relevant visitor session

Data handled: connect.sid

## **8.) Complaint handling**

When handling a complaint, VPI Kft does not register any personal data on its website. It provides the necessary contact details for complaint handling, whereby the person concerned can send the complaint to the company's entrusted data processing officer. When making a complaint, it is necessary to voluntarily provide a certain set of personal data in order to identify the person concerned, which is handled carefully by the data processing officer while guaranteeing the security of the personal data.

Mailing address: H-1116 Budapest, Fehérvári út 132-144., Hungary

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

## **9.) Data controlling of contact details and call for proposals**

Purpose of data management: contact details and contact management, request for quotation, compile the best possible answer/offer/quotation to the user's question when handling a request for quotation

Legal basis for data processing: by writing the letter the voluntary and active contribution of the data subject

Data processed: When contacting, name/company name, e-mail address, phone number and if applicable, other necessary information related to the offer: location, time, detailed information about work...

Duration of data processing: The personal data provided during the contact will be stored until the withdrawal of the consent, but for a maximum of 5+1 years. The data subject has the opportunity to request the deletion of its personal data at any time.

## **10.) Processing data of customer, supplier and counterparts**

Purpose of data management: fulfilment of the legal and contractual obligations of VPI Kft.

Legal basis for data processing: customer data, technical content and other data transferred when companies, businesses and individuals enter into contractual relationship with VPI Kft.

Data transferred in the context of their economic activities between VPI Kft. and other legal entities or their legal representatives, natural persons are handled in full compliance with legal requirements.

Retention period is set out in the established contract, but complies with at least the statutory period.

## **Management of counterparties' data – records of customers, suppliers**

For the purpose of concluding, fulfillment or termination of the contract, or for providing discounts, the Company manages the personal data (name, birth name, date of birth, mother's name, address, tax identification number, identity card number, address, registered office, location of plant, telephone number, e-mail address, website address, bank account number) of the natural individual or that of the representative of the Customer / Supplier VPI Kft has a contractual relationship with. This data processing is considered lawful even if the processing is necessary for the preparation requested by the data subject prior to the conclusion of the contract.

Recipients of personal data: employees of the Company performing customer service-related tasks, accountants, tax advisors and data processors.

Duration of processing of personal data:

Unless otherwise stipulated in the contract, it shall expire after 5+1 years from the termination of the contract.

One-time purchases, commercial offers and orders, as well as the processing of related sales data shall also be treated as described in this section.

## **Contact details of the representatives of legal partners, customers, suppliers or natural persons**

Scope of personal data to be handled: the name, address, telephone number, e-mail address, online ID of the natural person.

Purpose of personal data processing: performance of the contract concluded with the legal partner of the Company

Legal basis: the consent of the data subject and a legitimate interest.

Recipients of personal data and categories of recipients: employees of the Company performing customer service-related tasks

Duration of personal data storage: until the end of the contractual relationship or business relationship or for 5 years after the legal representative's position has been ceased. In case VPI Kft. has a warranty obligation set out in the contract, VPI Kft. stores the personal data of the company representative involved in the contractual relationship until the end of the warranty period.

## **11.) Miscallaneous data processing, appearances for marketing purposes**

VPI Kft. shall be entitled to process photos and video materials appearing on its website after the voluntary consent of the individuals appearing on such material.

The data controller shall publish photographs and video materials taken for advertising purposes (print and digital version) only with the voluntary consent of the individuals appearing on these.

The data controller shall publish fotos on its website, on facebook and in the printed media only after the voluntary consent of the individuals appearing on these.

## Handling of personal data breach

The data protection officer shall notify the competent authority about any data breach.

Before notifying the authority, the Data protection officer shall investigate the breach and after thorough information obtained, decides on the seriousness of the case.

The officer shall investigate the time and place of the incident, the description, circumstances and effects of the incident, the scope, the number of data compromised during the incident, the scope of the persons affected by the compromised data, the description of the measures taken to avert the incident, and the description of the measures taken to prevent, avert and reduce the damage.

If the data breach is likely to pose a high risk to the rights and freedoms of natural persons, or a wide-ranging involvement or a low number of data loss or damage but of high importance, the officer shall inform the data subject and the data protection authority of the data breach without undue delay. (The authority shall be notified on the notification interface of the NAIH website).

The Data Protection Officer is **obliged to report the data breach** without undue delay, but **no later than 72 hours after becoming aware of it**.

In the event of a serious data breach or incident, the data subjects must be notified one by one immediately, if this is not possible due to the large number of data subjects, they can also be notified en masse with the involvement of the press.

About the elimination of the data protection incident, both the data subjects and the data protection authority shall be notified.

If, in accordance with the principle of accountability, the data controller can prove that the data protection **incident is unlikely to entail or**, as a result of the assessment of the situation, **poses a low risk to the rights and freedoms of natural persons, the notification may be omitted**. It is sufficient to register the data listed above in in the company's incident registry and to takes the necessary measures performed by the data protection officer.

Data Protection officer: László Vince  
Data processing e-mail: [info@laszlovince.hu](mailto:info@laszlovince.hu)

## 13.) Use and transmission of data

In all cases when VPI Kft. intends to use the data provided for other reasons than the purpose of the original data collection, VPI Kft shall in inform the data subject thereof and obtain its prior written consent and grant the opportunity to withdraw this consent at any time thereafter.

VPI Kft. shall not transmit any personal data to third parties under any circumstances, except in the cases laid down in the legislation or in legal provisions in force.

## 14.) Community directives

The Company maintains social media sites for the purpose of introducing and promoting of its products and services.

The Company considers the question posted on the Company's Facebook page to be an officially submitted question or complaint, which is subject to the regulation of complaint handling.

The Company does NOT process personal data posted by visitors on the Company's Facebook page.

Visitors are subject to Facebook's Privacy policy and Service Terms.

In the event of the publication of illegal or offensive content, the Company may exclude the data subject from its members without prior notice or delete his comment.

The Company shall not be responsible for data content or comments that violate the law published by Facebook users. The Company shall not be liable for any errors, malfunctions or problems arising from the change of Facebook's operation.

## 15.) legal definitions of specific terms used in this information material

**personal data:** shall mean data related to the data subject, in particular the name and identification mark of the data subject and one or more knowledge of his physical, physiological, mental, economic, cultural or social identities, and the conclusion to be drawn therefrom concerning the data subject;

**data holder:** means the private, natural or legal person whose data are processed

**data controller:** a natural or legal person or an unincorporated entity who, independently or together with others, determines the purpose of the data processing, takes and implements decisions relating to data processing (including the device used) or implements these with the processor appointed by him or her.

**data management:** irrespective of the procedure applied, any operation or totality of operations on the data, in particular collecting, recording, recording, organizing, storing, changing, using, querying, transmitting, disclosing, coordinating or linking, locking, deleting and destroying, preventing the further re-use of the data, taking photographs, recording audio or images, as well as physical characteristics suitable for identifying the person (e.g. fingerprint or palm prints, DNA samples, iris scans);

**data transmission:** disclosure of the data to a specific third party;

**deleting data:** Making data unrecognisable by means that their recovery is no longer possible

**data processing:** The performance of technical tasks linked to the processing operations, regardless of the model and device used for the execution of the operations and the place where the application is applied, provided that the technical task is carried out on the data

**data processor:** a natural or legal person or an unincorporated entity which processes the data based on the contract with the data controller, including the conclusion of a contract under the provisions of the law;

**third party:** a natural or legal person or an unincorporated entity which is not the same as the data subject, controller or processor;

## 16.) Legal declaration: cessation of data processing, modification or delete of data

The individual may dispose of his personal data, object against the processing or transfer of his personal data, the cases of which are listed by law. If the individual objects, he or she can do so in writing.

The protest must be investigated and decided on by the data processor of personal data within a maximum of 15 calendar days. The individual shall be informed in writing about the decision made this way. The decision should also indicate the actions taken by the data controller.

The individual may initiate proceedings before court within 30 days of receipt of the decision if he or she does not agree with it. The individual may request the deletion of its own personal data.

Postal address: H-1116 Budapest, Fehérvári út 132-144

Data protection officer: László Vince, [info@laszlovince.hu](mailto:info@laszlovince.hu)

The data subject may exercise his right of appeal, including claim for damages in respect of personal data processed by the VPI Kft. In the event of an attempt to settle the dispute between VPI Kft and the concerned party will be unsuccessful, the concerned party may turn to court. Remedies may be exercised at the competent court and the National Authority for Data Protection and Freedom of Information:

Postal address: H-1530 Budapest, PO. Box 5  
Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c  
Telefon: +36 (1) 391-1400  
Fax: +36 (1) 391-1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
URL: <http://naih.hu>

VPI Kft shall compensate for the damage caused by the unlawful handling of the data concerned or in breach of the requirements of data security.

VPI Kft. is also liable for damages caused by the processor to the data subject concerned. VPI Kft. shall be exempt from liability if it can be proved that the damage was caused by an unavoidable cause outside the scope of data processing. The damage must not be compensated if resulted from intentional or grossly negligent conduct by the injured party.

#### Right to complain at the supervisory authority (right to appeal to judicial authority)

The data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which he is habitually resident, has a workplace at or where the alleged infringement occurred, if the data subject considers that the processing of personal data relating to him is in breach of the Regulation.

#### Right to efficient judicial redress against the supervisory authority

Each natural and legal person shall be entitled to efficient judicial redress against the legally binding decision of the supervisory authority concerning him or if the supervisory authority does not deal with the complaint or informs the data subject within three months of procedural developments or the outcome of the complaint lodged.

#### Data holder's rights: according to Section 14 of Act CXII of 2011 (Info tv.) the data owner in respect of personal data processed by the data controller and the processor acting on behalf of or at its disposal, under certain conditions,

- (a) shall be informed of the facts relating to the data processing before the start of the processing
- (b) at his request, his personal data and the information relating to their handling shall be made available to him by the data controller
- (c) at his request and in certain cases, his personal data shall be corrected or supplemented by the data controller
- (d) at his request and in certain cases, the processing of his personal data shall be restricted by the data controller
- (e) at his request and in certain cases, his personal data shall be deleted by the controller

If the data controller or the data processor acting on his behalf or at his disposal rejects the request of the data owner to correct, delete or restrict the processing of such data, the data controller shall inform the data subject in writing without any delay

- (a) about the fact of refusal, its legal and factual reasons, and
- (b) the rights of the data subject and the manner in which they are enforced, and that the right for personal data correction, deletion or restriction of the processing may be exercised with the assistance of the National Data Protection Supervisor and Information Freedom Authority.  
(According to Act to Section 21 Point 1 of Act CXII of 2011 (Info tv.))

Data holder's remedies:

The data holder may initiate proceedings before court against the data controller or the data processor (regarding the actions taken related to its data processing procedures), if according to his judgement the data controller or the data processor appointed or acting on his or her behalf, is in breach of the provisions of the law when processing his personal data, as defined by law or in the binding Act of the European Union. (according to Act to Section 23 Point 1 of Act CXII of 2011 (Info tv.))

*The data holder made this statement of acknowledgement in the light of the preliminary information in which he became aware of the legislation in force relating to the data processing.*

The individual made his present consent statement for the processing of his personal data in addition to the information in which he became aware of the fact that VPI Kft. cannot delete the data of the individual as long as it was decreed on data processing. An individual may withdraw this statement at any time, i.e. object to the processing of his personal data.