

DATA MANAGEMENT INFORMATION

We kindly ask you to carefully read this privacy notice, which informs visitors to our website about the processing and protection of personal data and information and about visitors' rights. If you are under the age of 18, please read this privacy notice together with your legal representative.

**For any questions or comments, please contact us at:
info@lector.hu, phone +361 321-1516.**

Who are we, who do you trust with your personal data, how can you reach us?

CORPUS COMMUNICATIONS Kft. (1025 Budapest, Csalán utca 26.), which also operates Lector Translation Agency, has been a Hungarian registered company providing translation, PR and marketing services for several decades.

Company details:

CORPUS COMMUNICATIONS Ltd

Registered office: 1025 Budapest, Csalán utca 26.

company registration number: 01-09-692241

Tax number: 12552267-2-41

Represented by Zoltán Nagy, Managing Director

Contact person for data protection matters: Gabriella Novák

Contact: info@lector.hu, phone +361 321-1516

Whose data is meant?

Our Privacy Policy and our Notice cover the processing of personal data **relating to natural persons**, i.e. any case where our company obtains data relating to identifiable data that can be linked to a natural person.

What legislation is the basis for data processing?

Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)
Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information Positions of the Commission's Working Party 29 and the Data Protection Office (DPA)

What principles do we follow when processing your data?

Our Company processes data in accordance with the GDPR **and the following principles:**

- **lawfulness:** the company has a legal basis for the processing as laid down in the regulation: there is a reason for the processing
- **fairness:** as required by law and in the interests of the data subject the processing is carried out in accordance with the following
- **transparency:** data management can be monitored at every stage of the process
- **go to bound to:** data exclusive contact made known to it, The company will process the data in accordance with a predefined purpose,

- **data economy:** we collect data only to the extent and for the duration necessary for the legal basis
- **Accuracy:** data are recorded in accordance with their veracity, and the right of rectification, restriction or erasure is ensured
- **limited storage:** data is only kept for the time necessary for the legal basis,
- **Integrity and confidentiality:** we ensure that only those who need to access the data in order to provide the service, to fulfil the stated purpose, have access to the data needed.

Why is my data processed?

You have given your consent to the processing of your data, as follows:

Through the website/community page, users visiting the website (hereinafter referred to as the "Visitor") may voluntarily register and provide personally identifiable information data (name, email address, other data uploaded or provided by the Visitor). By voluntarily submitting data, the Visitors agree that the sole owner, operator and maintainer of the website, i.e. our company, may process the data provided in accordance with the terms of this information. Please take all necessary measures to keep your user name and password confidential so that third parties do not have access to them. We also ask you to provide us only with the information necessary for the
To contact you.

Our Company processes your data for the purposes of a contract with you or the fulfilment of your order or the submission of an offer in response to your request for a quote:

You have contracted with us orally (by phone) or in writing (by email, via the internet) to provide a service, ordered a service or requested a quote from us (collectively, "contract performance"). We need to keep your data on file in order to perform the service. The data we process: name, address, contact details (phone, email), billing address. Possible additional data: job details.

Our Company may also process your data if it **can demonstrate a legitimate interest** in processing your data.

How do we handle your data?

We will process the personal data and information provided to us only in connection with the purpose for which the Visitor has provided it and will use it only to fulfil the Visitor's needs and to communicate with the Visitor. The purpose of the processing is to fulfil the information request indicated by the Visitor, to communicate with the Visitor, to fulfil the Visitor's order.

The data may be processed by Corpus Communications Ltd in accordance with the provisions of the contract or the law.

collects, processes, stores and destroys (erases).

Corpus Communications Ltd. **will** only **transfer** data in the following cases:

- in the context of its processing activities, to a public authority on the basis of instructions from the controller in relation to the completion of a return, or
- the data processor who has entered into a data processing contract with him or her and is involved in the performance of the contract to its subcontractor, or
- where the data subject requests the transfer or has given his or her prior consent, or if required by law.

For information about the data processors of Corpus Communications Kft, please contact. We always conclude a data processing contract with our data processors, in which the data processors undertake to process the data in accordance with this information.

Corpus Communications Ltd. shall **delete (destroy)** data at the written request of the data subject, the retention of which is not required by law, or which is no longer necessary for the performance of a contractual obligation or for the purpose of proving it, or the deletion of which is requested by the data subject and the processing is based solely on your consent.

The electronic data will be deleted in such a way that it is not possible to recover them, and the paper data will be destroyed in a destruction facility or by a company specialised in destruction according to its main activity.

The data is collected and stored electronically by Corpus Communications Ltd. Data relating to employees and contracts are also available on paper. Personal data processed on paper are stored in folders at the headquarters or premises of Corpus Communications Ltd. At both the headquarters and the premises, only authorised employees handle the data, no other person has access to the folders (lockable cabinets and rooms).

Employees have been informed that only authorised persons have access to data on paper and that they must prevent access (keys must be kept, unauthorised third parties must not be left alone in the room with an open locker).

Personal data collected electronically is stored and protected in the following ways: The electronically recorded data are stored on servers operated by Corpus Communications Ltd. The information technology network of Corpus Communications Kft. external protection is provided by a multi-level firewall system. Data stored in databases is usually protected by two layers of access protection. At the database level, the data is directly accessible only by the administrator, while other persons can access the data only through the database application stored data. These applications are partly based on separate self-identification are used.

The erasure of data is carried out by the staff member responsible for data processing upon request, otherwise the data are reviewed on an ongoing basis, but at least once a year by the staff member responsible for data processing, and if they are no longer retained is not required, it will be deleted.

How long do we keep your data?

Where we process your data on the basis of your consent and there is no other legal basis (e.g. performance of a contract), we will continue to process your data until you withdraw your consent or the purpose of the processing is no longer relevant and you have consented to the deletion of your data.

If we process your data for the performance of a contract, we will keep it until the contract is performed and for 5 years after the termination of the contract, and we will keep the documents supporting our accounting statements for 8 years. After that, the data will be deleted.

If there is a legitimate interest in the processing of your data, we will process your data for as long as we can prove the legitimate interest. We will retain your data until the end of the 5th year after the legitimate interest ceases.

What should I know about cookies, other logging?

Corpus Communications Ltd. uses cookies on its website to facilitate your online visit and communication.

These cookies are provided by Google and are used through the Google Adwords system. These cookies are only sent to the visitor's computer when visiting certain sub-pages, so they only store the fact and time of the visit to the sub-page in question, and no other information.

The use of the cookies sent in this way is as follows: external service providers, including Google, use these cookies to store if the Data Subject has previously visited the advertiser's website and, on this basis, to display advertisements to the Data Subject on the websites of partners of external service providers, including Google. The Data Subject may use the (You may also indicate to the Data Subject that they can also opt-out of cookies from third-party service providers by visiting the Network Advertising Initiative opt-out page.)

Once blocked, they will no longer receive personalised offers on the
From the Service Provider.

Applied cookies:

Session cookie: session cookies are automatically deleted after the Data Subject's visit. These cookies are used to enable the Service Provider's Website to function more efficiently and securely, and are therefore essential to enable certain functions of the Website or certain applications to function properly.

Persistent cookie: persistent cookies are also used by the Service Provider to improve the user experience (e.g. to provide optimised navigation). These cookies are stored for a longer period of time in the browser's cookie file. This duration depends on whether the cookie is used for the purpose of

The setting of your internet browser. A cookie used for a password-protected session.
Shopping cart cookie.

Security cookie.

External servers help us to keep track of the Site's traffic and other web analytics data, independent measurement and auditing (Google Analytics). The data controllers can provide the Data Subject with detailed information on the processing of the measurement data.

Contact: www.google.com/analytics

If the Data Subject does not want Google Analytics to use the above data for the as described above, you should install a blocking add-on in your browser. The "Help" function in the menu bar of most browsers provides information on how to use the browser to

- how to disable cookies,
- how to accept new cookies, or
- how to instruct your browser to set a new cookie, or
- how to turn off other cookies.

In addition to the above, when you use Lector, your browser may send automatic information when you open a website, or information sent by your mobile application when you use it, e.g. IP address, websites visited, activity logging. Information about the

device you are using, e.g. type, operating system, settings, unique identifiers. This information depends on the settings, and in this respect we recommend that you also consult the information technology, settings, security policies, user manuals for each device.

Corpus Communications Ltd also informs and authorises the use of cookies by the user on the website. Corpus Communications Ltd. does not collect data from cookies and does not process or store them.

Why do I receive newsletters, what rights do I have in relation to newsletters?

The Corpus Communications Ltd. sends newsletters only on the basis of the consent of the data subjects (in the box marked for this purpose in the e-mail or on the Internet). At the bottom of the newsletter, the data subjects are informed of their rights: unsubscribe, rectification. In case of unsubscription, Corpus Communications Ltd. will delete the data of the data subject for the purpose of sending the newsletter and will no longer process it. In the case of newsletters sent in the framework of its processing activities, the data controller shall declare in the processing contract that all data transmitted for processing are lawfully processed.

What rights do I have regarding the processing of my data?

a. Right to information

You have the right to be informed in an understandable way about the reasons why, what data is processed, how and for how long. In order to provide you with the information, we need to be able to identify that we are providing it to you, so you can only request it in person at a pre-arranged appointment or in writing. In the case of a written request, two witnesses are required for the request; in the case of an electronic request, we can accept and fulfil requests from your own e-mail address, which we maintain. If this is not possible, please submit a written request with two witnesses by post, which we will fulfil by post.

Information on the request within 15 days of receipt of the request we are fulfilling and responding to. We do not charge any costs.

b. Data treatment: right to rectification, right to object, right to restriction and erasure, data portability

At the request of the data subject, Corpus Communications Ltd. shall promptly **correct** inaccurate personal data or complete them at the request of the data subject.

The data subject **may object at** any time to the processing of his or her personal data based on the public interest, the performance of a public task or a legitimate interest. The controller may continue to process the data only if he or she can demonstrate 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. Where 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.

At the request of the data subject, the Controller **shall restrict** processing where the accuracy of the data is contested, the processing is unlawful but the data subject requests only restriction and not erasure, the controller no longer has a legal basis for the data but the data subject requests processing for the exercise of a right, or during the

period of the investigation pending a decision on the lawfulness of the processing following an objection by the data subject. The data subject shall be informed of the lifting of the restriction.

At the request of the data subject, in the event of withdrawal of consent, or upon objection, the controller shall promptly **erase** personal data concerning the data subject, unless the processing is still necessary for another legal ground, or the processing is justified in the public interest, or is necessary for the establishment, exercise or defence of legal claims. The data must also be erased if they have been unlawfully processed or if their erasure is required by law.

Corpus Communications Ltd. will notify the data subject of the rectification, restriction or deletion of the data, unless it proves impossible or involves a disproportionate effort.

c. Right of redress

The data subject has the right to apply to the authority designated by law for that purpose make a complaint. You can appeal against the authority's silence or decision to a court. The data subject has the right to take legal action against unlawful processing of personal data.

Can an unauthorised person access my data?

If your data has been compromised or is at risk of being compromised by an unauthorised third party, we are talking about **a data breach**.

Corpus Communications Ltd. has not had a data breach in the decades prior to May 2018. A potential risk may arise:

- loss or theft of devices containing data (laptop, mobile phone)
- burglary
- attack against a server
- the intentional or unlawful disclosure of personal data to an unauthorised third party carelessly publishing or making available.

In order to prevent Corpus Communications Ltd:

- allows access to personal data only to those who need it for the performance of their work, and provides access with a username and password,
- constantly monitors its servers and IT security system and ensures the level of security expected of a company providing IT services, and adapts its equipment accordingly,
- inform employers about the necessary data protection measures.

If any employee of Corpus Communications Ltd. becomes aware that a data breach has occurred, he or she will immediately report it to the Managing Director of Corpus Communications Ltd., who will immediately appoint a person who will assess the data subjects and their data and the possible risks within 24 hours. He/she will immediately make a proposal for the handling of the incident, which will be communicated to the Managing Director. The administrator shall decide on the necessary measures to prevent, avoid or at least reduce the damage.

If the personal data breach is likely to result in a high risk to the rights and freedoms of the data subject, Corpus Communications Ltd. shall inform the data subject of the personal data breach without undue delay, with the following minimum content: the nature of the

breach, the name and contact details of the contact person, the likely consequences of the breach, the measures taken or envisaged to remedy the breach.

This Privacy Policy shall enter into force on 25 May 2018. For matters not covered by this Policy, the provisions of the GDPR Regulation and the Hungarian legislation issued pursuant to it shall prevail.

Budapest, 25 May 2018.

A handwritten signature in blue ink, appearing to read 'Zoltán Nagy', is written over a horizontal dotted line.

Zoltán Nagy Managing Director
Corpus Communications Kft Managing Director