

# PRIVACY POLICY

Arteries Studio Kft. (*registered seat: 1139 Budapest, Forgách utca 9/b.; company registration number: 01-09- 299564; tax number: 23854855-2-41; hereinafter referred to as the "Company"*) provides the following information to You as the Data Subject of personal data processed by the Company (*hereinafter: "Privacy Notice"*) in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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; hereinafter "**GDPR**") and Act CXII of 2011 on Informational Self-determination and Freedom of Information ("**Info Act**"),

The subject matter of this Privacy Notice covers all processes in which personal data is processed by all departments of the Company. The temporal validity of this Privacy Notice is until its withdrawal. The Company reserves the right to amend this Privacy Notice and will notify you accordingly by publishing the modified Notice on its website.

## I. Data Processor

Data processor:

**Arteries Studio Korlátolt Felelősségű Társaság**

Registered seat: 1139 Budapest, Forgách utca 9/b.

Company registration number: 01-09-299564

Tax number: 23854855-2-41

Phone number: +36-30/553-3911, Email address: [iroda@arteries.hu](mailto:iroda@arteries.hu)

## II. General definitions

- a) **Data Subject** shall mean an identified or identifiable natural person (*a natural person who is identified or identifiable, directly or indirectly, in particular by an identifier such as a name, an identification number, location data, an online identifier or by the physical, physiological, genetic, mental, economic, cultural or social.*



- . b) **Personal Data** shall mean any information relating to an identified or identifiable natural person (*'Data Subject'*); *An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*
- . c) **Specific data** shall mean all data in special categories of personal data, i.e., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for the purpose of uniquely identifying natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons;
- . d) **Data controller** shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data) or has the data processed with the processor, *within the limits set by law or by a legally binding act of the European Union;*
- . e) **Data processing** shall mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, prevention of their further use, taking of photographs, sound recordings or images and the recording of physical characteristics which can be used to identify a person (*e.g. fingerprints, palm prints, DNA samples, iris scans*);
- . f) **Data processor shall** mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of or under the authority of the controller, within the limits and *under the conditions laid down by law or by a legally binding act of the European Union;*
- . g) **Privacy incident** shall mean a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or transmission of, or access to, personal data transmitted, stored or otherwise processed.

**Additional rules:**

- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities
- Act CXXXIII of 2005 on the rules of personal and property protection and private investigation
- Act C of 2000 on Accounting – the accounting Act

### III. Data processing by the Company

**3.1. Visiting the website** The Company does not require any personal data to view the information published for the public on the website <https://www.arteries.hu/> . The Company uses Google Analytics cookies to analyze visitors' preferences in order to ensure the user-friendliness of the website. For example, cookies are used to record the following information: the number of visitors to the website and sub-pages, the duration of the visit, the order in which pages are viewed, the search terms used to access the website, the type of browser used to access the website, the geographical location of the computer used to access the website. The Company does not collect any personal data about visitors to the website. The cookies used on the website only record the anonymous IP address of the visitor's computer and do not collect any personal data or information that would allow a real person to be identified. The Company does not process any personal data other than the visitor's anonymized IP address in connection with this activity.

**3.2. Data processing of the request for proposal** The Company is entitled to process the personal data of the interested parties which are necessary for the provision of the service to the interested parties. In order to fulfil the request for a quotation, the Company processes the name, e-mail address and telephone number of the applicant.

- . a) **Purpose of data processing:** the purpose of data processing is to enable the Company to provide information about its products and services to the interested party, with a view to the subsequent conclusion of a contract between the data subject and the Company.
- . b) **Legal basis of data processing:** the legal basis for processing is the consent of the data subject [*Article 6(1)(a) GDPR*], the legitimate interest of the Company [*Article 6(1)(f) GDPR*] and the conclusion and performance of a contract between the data subject and the Company [*Article 6(1) GDPR*].(b).
- . c) **Duration of processing:** the duration of processing is until the data subject's consent is withdrawn.

### 3.3. Data processing of contracts

The Company is entitled to process the personal data of its customers which are related to the offer and contract between the customer and the Company, including its formation, registration and performance. The scope of the data processed: data provided in the request for quotation, order, contract, contact information and data necessary for the issue of receipts.

- . a) **Purpose of data processing:** the purpose of the processing is solely related to the conclusion, performance, modification or termination of the contract.
- . b) **Legal basis of data processing:** the legal basis for processing is the consent of the data subject [*Article 6(1)(a) GDPR*], the legitimate interest of the Company [*Article 6(1)(f) GDPR*] and the conclusion and performance of a contract between the data subject and the Company [*Article 6(1) GDPR*].(b).
- . c) **Duration of processing:** the duration of the data processing is 8 (*eight*) years after the performance of the contract, in accordance with the legal provisions on the retention of supporting documents under the accounting Act.

### 3.4. Processing of personal data of applicants for job offers

The Company processes the personal data contained in the "*incoming*" and targeted CVs and other attached documents received directly or through a recruitment intermediary. Scope of the data processed: personal data provided by the data subject in the CVs and other attached documents.

- . a) **Purpose of data processing:** the purpose of the processing the purpose of the processing is to inform the data subject of job vacancies that best match his/her qualifications and interests, to arrange an appointment with the data subject and to carry out the selection procedure.
- . b) **Legal basis of data processing:** the legal basis for processing is the data subject's voluntary consent [*GDPR Article 6(1)(a)*], which is given by the data subject by sending his/her CV and related documents.
- . c) **Duration of processing:** the duration of the processing is the duration of the employment relationship in the case of a successful application, in the case of an unsuccessful application, the application files of unsuccessful applicants are deleted after the selection.

### 3.5. Subscriber to newsletters

The Company may process Your personal data (provided for the purpose of receiving newsletters) in order that You receive the newsletter at the provided contact point as per Your request, until You unsubscribe as Data Subject.



- . a) **Purpose of data processing:** the purpose of data processing is to send newsletters about news, services and promotions concerning Arteries Studio Kft.
- . b) **Legal basis of data processing:** the legal basis for processing is the consent of the data subject [*Article 6(1)(a) GDPR*], the legitimate interest of the Company [*Article 6(1)(f) GDPR*] and the conclusion and performance of a contract between the data subject and the Company [*Article 6(1) GDPR*.(b)].
- c) **Duration of processing:** it lasts until the data subject's consent is withdrawn. The Company will process the user's data for the duration of the data subject's consent. If the user withdraws his/her consent to the processing of personal data, the Company shall immediately and definitively delete them from its records.
- . d) **Recipients:** MailChimp email marketing software (512 Means St Suite 404 Atlanta, GA 30318 USA), who will store the data on [www.mailchimp.com](http://www.mailchimp.com) until consent to processing is withdrawn.

## IV. Right to access to the data

Personal data may be accessed by the Company's employees who have access rights related to the relevant data processing purpose, or by persons or organizations performing data processing or outsourcing activities for the Company on the basis of service contracts, to the extent and to the extent necessary for the performance of their activities, as determined by the Company.

The Company does not use third party data processing services in the course of data processing.

## V. Rights relating to data processing and their enforcement

### 5.1. Right to request information and right of access

The data subject may request in writing that the Company inform him/her:

- . a) what personal data,
- . b) on what legal basis,
- . c) for what purpose,
- . d) from what source,
- . e) for how long it will process the data,
- . f) to whom, when, under what law, to which personal data, to which personal data has the Company given access or to whom has the Company transferred the personal data.



The Company shall comply with the data subject's request within a maximum of 15 (*fifteen*) days by sending an e-mail or postal letter to the contact details provided by the data subject.

The Company may ask the data subject to clarify the content of the request and to specify the information or processing activities requested before granting the request.

Where the right of access of the data subject under this point adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, the Company shall be entitled to refuse to comply with the data subject's request to the extent necessary and proportionate.

In the event that the data subject requests more than one copy of the above information, the controller shall be entitled to charge a reasonable fee proportionate to the administrative costs of producing the additional copies.

Where the Company does not process the personal data indicated by the data subject, it shall also inform the data subject in writing.

## **5.2. Right to rectification**

The data subject may request in writing that the Company amend personal data that is inaccurate, incorrect or incomplete. In such a case, the Company shall without undue delay, but no later than within 5 (*five*) days, rectify or correct the personal data indicated or, if compatible with the purposes of the processing, supplement them with additional personal data provided by the data subject or with a declaration by the data subject on the personal data processed. The Company shall notify the data subject thereof by electronic or postal mail to the contact details provided by the data subject.

The Company is exempted from the obligation to make a correction if.

- . a) the accurate, correct or complete personal data are not available to the Company and are not provided by the data subject; or
- . b) the accuracy of the personal data provided by the data subject cannot be established beyond reasonable doubt.

## **5.3. Right to erasure**

The data subject may request the Company in writing to erasure his or her personal data. The data subject shall submit his/her request for erasure in writing and shall indicate the reasons for which he/she wishes to erase the personal data.



The Company shall refuse the erasure request if a law obliges the Company to continue to store the personal data. If there is no such obligation on the Company, the Company shall comply with the data subject's request within a maximum of 15 (*fifteen*) days and shall notify the data subject thereof by electronic or postal mail to the contact details provided by the data subject.

The user may unsubscribe from the newsletters sent by the Company by clicking on the "Unsubscribe" link at the bottom of the mailings. In addition, you may request in writing to the Company's contact email address indicated above (iroda@arteries.hu) or by post to cease processing.

In case of unsubscription, the Company will delete the User's Personal Data in the newsletter database.

#### **5.4. Right to blocking**

The data subject may request in writing that his or her personal data be blocked by the Company. The blocking shall last as long as the reason indicated by the data subject makes it necessary to store the data. The data subject may request the blocking of data, for example, if he or she believes that his or her personal data have been unlawfully processed by the Company, but it is necessary for the purposes of official or judicial proceedings initiated by the data subject that the personal data are not deleted by the Company. In such a case, the Company will continue to store the personal data until the authority or court requests it, after which it will delete the data and notify the data subject thereof by e-mail or post to the contact details provided by the data subject.

#### **5.5. Right to the Restriction of Data Processing**

The data subject may request in writing that the Company restrict the processing of his or her personal data. During the period of restriction, the Company or a data processor acting on its behalf or under its instructions may carry out processing operations other than storage of the personal data concerned by the restriction solely for the purposes of pursuing the legitimate interests of the data subject or as provided for by law. The restriction of processing may be requested by the data subject when and for as long as necessary,

- . a) if the data subject contests the accuracy, correctness or completeness of the personal data processed by the Company or the processor and the accuracy, correctness or completeness of the personal data processed cannot be established beyond reasonable doubt (*for the period of the resolution of the doubt*),
- . b) if the data should be erased but there are reasonable grounds to consider, on the basis of a written statement by the data subject or on the basis of information available to the Company, that the erasure of the data would undermine the legitimate interests of the data subject (*for the duration of the legitimate interest not to erase the data*),





- . c) if the data should be erased, but the data need to be kept as evidence (*until the investigation or proceedings are closed*) in proceedings conducted by or with a public authority.

In the case of restriction, personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State of the European Union.

The Company shall inform the data subject in advance of the lifting of the restriction on processing.

The Company shall, without undue delay after complying with the data subject's request to exercise his or her right to restriction, inform the persons with whom the data subject has disclosed his or her personal data, provided that this is not impossible or involves a disproportionate effort on the part of the Company. The Company will inform the data subject of these recipients at his or her request.

## **5.6. Right to object**

If the processing of data subjects' data is based on a legitimate interest, the data subject must be provided with adequate information about the processing and the right to object. This right should be explicitly brought to the attention of the data subject at the latest at the time of the first contact with the data subject.

On this basis, the data subject has the right to object to the processing of his or her personal data and in such a case the Company may no longer process the data subject's personal data, unless it can be demonstrated that:

- . a) the processing is justified by compelling legitimate grounds on the part of the Company which override the interests, rights and freedoms of the data subject, or
- . b) the processing relates to the establishment, exercise or defense of legal claims by the Company.

If the data subject objects to the processing of data for direct marketing purposes, the Company may no longer process the data subject's data for these purposes.

## **5.7. Right to Redress**

### ***5.7.1. Dispute settlement with the Company***

The data subjects may lodge their objections or requests regarding the processing of their personal data with the Company orally (*in person*) or in writing (*in person or by means of a document delivered by another person, or by post or e-mail*) using the contact details indicated in point I. under the name of the Data Controller.

### ***5.7.2. Right to complain***





If your objections, complaints or requests regarding your personal data have not been satisfactorily resolved with the Company, or if you consider at any time that there has been or is an imminent threat of a breach of rights in relation to the processing of your personal data, you have the right to lodge a complaint with Hungarian National Authority for Data Protection and Freedom of Information.

### **Contact details of the Hungarian National Authority for Data Protection and Freedom of Information**

Seat address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c. Postal address: 1530 Budapest, Pf. 5  
Phone: +36(1)3911400 Fax: +36(1)3911410 E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) Web: [naih.hu](http://naih.hu)

#### ***5.7.3. Right to apply to the courts (right of action)***

*Irrespective of their right to lodge a complaint*, the data subject may go to court if their rights under the GDPR or the Info Act. have been violated in the processing of their personal data.

The Company, as a data controller established in Hungary, may be sued before a Hungarian court.

The data subject may also bring the action before the court of the place of residence. The contact details of the courts in Hungary can be found at the following link: <http://birosag.hu/torvenyszekek>.

## **VI. Other information**

### **6.1. Enforcement of rights relating to personal data after the death of the data subject**

Within five years after the death of the data subject, the rights of the deceased during his or her lifetime may be exercised by a person authorized by the data subject by means of an administrative arrangement or a declaration made to the controller (*in a public or private document with full probative value*). If the data subject has not made such a declaration, the rights of the deceased during his or her lifetime may be exercised by his or her close relative within the meaning of the Civil Code within five years of the death of the data subject (*in the case of more than one close relative, the first to exercise the rights shall be the first to exercise them*).