

Last modified: September 15, 2020

## DATA PRIVACY BULLETIN FOR BUSINESS PARTNERS OF ALIZ TECH KFT.

### 1. GENERAL INFORMATION

**Aliz Technologies Korlátolt Felelősségű Társaság** (seat: 1143 Budapest, Gizella út 42-44., company Reg. No: 01-09-924920, „**Company**”) processes information in connection with its agreements on goods or services entered into, or to be entered into, with its contracting parties (the “**Contracting Party**”) so especially their conclusion, performance, amendment and termination which information qualifies as “*personal data*” as defined in point 1 of article 4 of the General Data Protection Regulation No 2016/679 of the EU (“**GDPR**”) applicable starting 25 May 2018. This Data Protection Notice (“**Notice**”) provides information regarding the processing of these personal data and the rights and remedies of the individuals.

In addition to this bulletin, provisions of other policies of the Company may also be applicable to certain data processing operations, as long as not contradicting to this bulletin.

#### **Contact details of the Company:**

The registered seat of the Company: 1143 Budapest, Gizella út 42-44.  
The company registration number of the Company: Cg. 01-09-924920  
The telephone number of the Company: + 36 70 513 3986  
The email address of the Company: hello@aliz.ai  
The website of the Company: <http://aliz.ai>  
The manager of the Company: managing director Tamas Szatmari

### 2. UPDATES AND AVAILABILITY

The Company reserves the right to unilaterally, in its reasonable discretion, modify or revoke this Notice unilaterally with effect subsequent to such modification, subject to the limitations provided for in the laws and with advance notification to the individuals in due time, if necessary, by making updates available. The Company may modify this Notice especially when it is required upon changes in the laws, the practice of the data protection authority, business needs or any new activity involving personal data processing or any newly revealed security exposures.

### 3. SPECIFIC DATA PROTECTION TERMS

By proving the affected data, the subject confirms having understood the version hereof as applicable at the time of submitting the affected data or information. In certain cases, specific privacy-related terms and conditions may also be applicable of which the individuals who are affected by them will be duly notified.

#### **4. SCOPE OF THE DATA AND THE PURPOSE OF THEIR PROCESSING**

The data subject provides the personal data to the Company in compliance with the applicable legal provisions as the case may be. The data subject warrants holding an appropriate and informed consent or a suitable legal basis for submitting personal data. The Company shall not be liable for any damages, loss or harm out of a non-compliance of the data subject with the above commitments or statements.

The table below describes the scope of the processed personal data, the purposes, the legal basis, the duration of the processing and the scope of the persons authorised to have access to the data are described.

Where this Notice indicates the relevant limitation period as the duration of data storage, then an event which interrupts the limitation period shall extend the term of the data processing until the new date when the underlying claim may lapse.

Purpose of the processing	Legal basis of the processing	Scope of processed data	Duration of storage, access rights, data transfers	Access granted to within / beyond the Company organization:
Data processing related to the communication and contacting with the Contracting Party in connection with the underlying agreement	Article 6 (1) f) of the GDPR	Personal data related with the Contracting Party and the individuals acting on its behalf (contact persons), such as full name, (mobile)phone number, email address	Until the communication or contacting with the Contracting Party is necessary for the performance of the underlying agreement.	<b>Managing director, business line managers, business partner contact person, sales representative, account manager, project manager, chief financial officer, assistant controller, accountant, auditor, legal service provider.</b>
Generic business data processing: handling of personal data provided in the framework of the contractual arrangement with the Contracting Party for purposes of accounting, auditing, claims enforcement, contracting, following up or property protection	Article 6 1. c) and/or f) of the GDPR	Personal data related with the Contracting Party and the individuals acting on its behalf (representatives), such as full name, signature	<b>5 years</b> after the date when the contractual relation ceased (Section 6:22 (1) of the Hungarian Civil Code – claims lapse in 5 years)  <b>Accounting documents:</b> duration of data storage is <b>8 years</b> (Sections 168-169 of Act C of 2000 on Accounting –“ <b>Hungarian Accounting Act</b> ”). E.g. the data that are included in documents which support the accountancy records e.g. data in contract documents between the Company and the counterparty (such as an order) or on an invoice.	<b>Managing director, business line managers, business partner contact person, sales representative, account manager, project manager, chief financial officer, assistant controller, accountant, auditor, legal service provider.</b>

## **5. DATA PROCESSORS**

The contracting partners engaged by the Company for carrying out technical tasks related to data processing operations are listed below. The particular tasks and liabilities of the data processor are, under the GDPR and the laws, stipulated by the Company, also holding a liability for the compliance of its instructions so given. The data processor shall not have the rights of substantial decisions regarding the processing, may process obtained data in line with the Company's instructions, may not perform data processing on its own behalf and shall store and keep personal data as instructed by the Company.

<b>Data processor</b>	<b>Personal data it has access to and is entitled to use as (i.e. by performing for the Company the activity of):</b>	<b>Is entitled to store data until:</b>
<b>legal services</b> Brassnyó Ügyvédi Iroda 1051 Budapest, József nádor tér 9. II/3.; Kovács és Kálmán Ügyvédi Iroda 1044 Budapest, Flottilla u. 86.	full name, (mobile)phone number, email address, signature	the term set out in the service agreement (as per Section 4)
<b>accounting services</b> H1 Könyvelőiroda és Tanácsadó Kft. 1038 Budapest, Temes utca 11, F/3	full name, (mobile)phone number, email address, signature	the term set out in the service agreement (as per Section 4)
<b>auditor</b> B. Kovács és Társa Kft. 1041 Budapest, Závodszy Zoltán u. 3. 6/30	full name, (mobile)phone number, email address, signature	the term set out in the service agreement (as per Section 4)

By forwarding data to the data processor the Company is not forwarding affected data to any third country beyond the EU.

**6. DATA FORWARDING TO OTHER PROCESSORS**

The Company forwards personal data to the below entities, acting as data handlers, which may set out the purpose of, resolve regarding the (technical) means of, or have a data handler retained regarding the performance of, data procession individually or in cooperation with others (incl. the Company).

<b>Addressee of data forwarding</b>	<b>Legal basis of data forwarding:</b>	<b>Is entitled to process data by (performing the task of) and until:</b>
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**7. TECHNICAL AND ORGANISATIONAL DATA SECURITY MEASURES**

Two-factor authentication for all document management system, deploying policies, defining data access levels, password protected accounts, installing firewall, encryptions.

## **8. DATA PROTECTION RIGHTS AND REMEDIES**

### **8.1 Data protection rights and remedies**

The detailed rights and remedies of the individuals are set forth in the applicable provisions of the GDPR (especially in articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and the Company provides information for the individuals in accordance with the above articles about their rights and remedies related to the processing of personal data.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the individual, information may also be provided orally, provided that the identity of the individual is proven by other means.

The Company will respond without unreasonable delay and by no means later than within one month of receipt to the request of an individual whereby such person exercises his/her rights about the measures taken upon such request (see articles 15-22 of the GDPR). This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Company notifies the individual about the extension also indicating its grounds within one month of the receipt of the request.

### **8.2 The individual's right of access**

- (1) The individual has the right to obtain confirmation from the Company whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and to the following information:
  - a) the purposes of the processing;
  - b) the categories of personal data concerned;
  - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed including especially recipients in third countries and/or international organisations;
  - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - e) the right of the individual to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the individual or to object to such processing;
  - f) the right to lodge a complaint with a supervisory authority;
  - g) where the personal data are not collected from the individual, any available information as to their source;
  - h) the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the individual.
- (2) Where personal data are forwarded to a third country, the individual is entitled to obtain information concerning the adequate guarantees of the data transfer.

- (3) The Company provides a copy of the personal data undergoing processing to the individual. The Company may charge a reasonable fee based on administrative costs for requested further copies. Where the individual submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the individual.

### **8.3 Right to rectification**

The individual has the right to request that the Company rectify inaccurate personal data which concern him/her without undue delay. In addition, the individual is also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

### **8.4 Right to erasure ('right to be forgotten')**

- (1) The individual has the right that when he/she so requests, the Company erase the personal data concerning him/her without delay where one of the following grounds applies:
- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Company;
  - (b) the individual withdraws consent on which the processing is based, and is no other legal ground subsists for the processing;
  - (c) the individual objects to the processing and there are no overriding legitimate grounds for the processing;
  - (d) the personal data have been unlawfully processed;
  - (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject;
  - (f) the collection of the personal data occurred in connection with offering services regarding the information society.
- (2) In case the Company has made the personal data public and then it becomes obliged to delete it as aforesaid, then it will, taking into account the available technology and the costs of implementation, take reasonable steps including technical steps in order to inform processors who carry out processing that the individual has initiated that the links leading to the personal data concerned or the copies or reproductions of these be deleted.
- (3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary, among other things, for:
- a) exercising the right of freedom of expression and information;
  - b) compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
  - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - d) the establishment, exercise or defence of legal claims.

### **8.5 Right to restriction of processing**

- (1) The individual has the right to obtain a restriction of processing from the Company where one of the following applies:
- a) the accuracy of the data is contested by the individual, for a period enabling the Company to verify the accuracy of the personal data;

- b) the processing is unlawful and the individual opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Company no longer needs the personal data for the purposes of the processing, but the individual requires them for the establishment, exercise or defence of legal claims;
- d) the individual has objected to processing based on the legitimate interest of the Company pending the verification whether the legitimate grounds of the Company override those of the individual.

- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with consent of the individual or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- (3) The Company informs the individual whose request has served as grounds for the restriction based on the aforesaid, before the restriction of processing is lifted.

#### **8.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The Company will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company informs the individual about those recipients if he/she so requests.

#### **8.7 Right to data portability**

- (1) The individual has the right to receive the personal data concerning him/her, which he/she has provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company, where:
  - a) the processing is based on consent or on a contract; and
  - b) the processing is carried out by automated means.
- (2) In exercising the right to data portability pursuant to paragraph 1, the individual shall have the right to have the personal data transmitted directly from one controller to another (e.g. the Company and other data processors), where technically feasible.
- (3) Exercising the aforesaid right shall not contravene to provisions concerning the right to erasure ('right to be forgotten') and, further, this right shall not harm the rights and freedoms of others.

#### **8.8 Right to object**

- (1) **The individual has the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her (including profiling) for the purposes of legitimate interests.** The Company will no longer process the personal data unless it demonstrates



compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual or for the establishment, exercise or defence of legal claims.

- (2) Where personal data are processed for direct marketing purposes, the individual has the right to object at any time to processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the individual objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
- (2) Where personal data are processed for scientific or historical research purposes or statistical purposes, the individual, on grounds relating to his/her particular situation, has the right to object to processing of personal data concerning him/her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### **8.9 Right to lodge a complaint with a supervisory authority**

The individual has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. In Hungary, the competent supervisory authority is the Hungarian Authority for Data Protection and Freedom of Information (<http://naih.hu>; 1530 Budapest, Pf.: 5; telephone: +36-1-391-1400; fax: +36-1-391-1410; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu))

### **8.10 Right to an effective judicial remedy against a supervisory authority**

- (1) The individual has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.
- (2) The individual has the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform him/her within three months on the progress or outcome of the complaint lodged.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

### **8.11 Right to an effective judicial remedy against the Company or the processor**

- (1) The individual, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
- (2) Proceedings against the Company or a processor shall be brought before the courts of the Member State where the Company or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the individual has habitual residence.