



***ADEXGO INDUSTRIES,  
TRADING AND SERVICES  
LIMITED LIABILITY COMPANY***

***DATA PROTECTION GUIDE***

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## I. Introduction

This Data Protection Guide of **ADEXGO Industries, Trading and Services Limited Liability Company** [original name in Hungarian: *ADEXGO Ipari, Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság*] (registered by the Court of Registry of Győr General Court under Trade Register No. 08-09-027980; tax number: 13409296-2-08; statistical code: 13409296-7219-113-08; postal address: 8230 Balatonfüred, Ifjúság u. 9/B II/2., Hungary; represented by: Dr. TÓTH, Tamás – Managing Director), a business association at 9021 Győr, Sarkantyú köz 5 acting as the controller comprises the rules applicable to processing Your as data subject's personal data.

### Controller's commitment:

Our Company as controller accepts to be bound by the content of this Guide, and our Company warrants that any and all information regarding its activity meets the expectations compliant with this Guide and the effective legal regulations.

We are fully aware of Your disposal over Your personal data, so we will use every effort to carefully process the data You share with us and to store them safe.

We appreciate Your trust, so we collect the fewest possible data and will do so only as provided in the law and with Your permit. We will use the data for the pre-defined purposes only and we will not disclose them to third parties without Your knowledge.

ADEXGO Industries, Trading and Services Limited Liability Company will make all efforts to protect Your data, including technical data protection, internal processes and measures for physical data protection.

This Guide provides information about processing Your personal data and Your related rights, in compliance with EU and national legislation, so You are requested to read this Guide carefully.

We will have the pleasure to be at Your disposal at any of the contact data in Section III of this Guide, for any questions, comments or recommendations.

Yours sincerely,

TÓTH Tamás

ADEXGO Kft.

Dr. TÓTH, Tamás – Managing Director

Székhely: 9021-Győr, Sarkantyú köz 5.  
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## II. Definitions

### (Glossary)

Term	Legislation	Simplified explanation (colloquial language)
Data Subject	any specific natural person identified or (directly or indirectly) identifiable by the personal data	the person who the Controller processes Personal Data about; in this case, this person is You
Controller	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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law	the person processing Personal Data about You; in this case, this is our Company
Processor	natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller	the person processing Your Personal Data on behalf our Company
Personal Data	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 online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person	any identifier referring to You: e.g. name, place and date of birth, personal identification number, portrait, health data etc.
Data Set	totality of data processed in one registration ( <i>Privacy Act</i> )	group of data processed about You and other Data Subjects, structured by some aspect

Processing	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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction	collection, recording, organization, storage, adaptation, alteration, retrieval, consultation of Personal Data; use, disclosure, transmission, dissemination, making available of such data; alignment, combination, restriction, erasure and destruction of Personal Data
Technical Processing	fulfilment of technical jobs related to the processing operations, regardless of the method and means used for the completion of the operations, or of the place of application, provided the technical job is done on the data ( <i>Privacy Act</i> )	any technical operation on Personal Data
Recipient	a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing	the third party who the Controller transmits the Personal Data processed about You to

Consent of the Data Subject	any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her	Your consent, after being duly informed in compliance with the legal regulations, to the Controller to process Your Personal Data
Third Party	a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data	any person other than the Controller, Data Subject or Processors, the persons employed or commissioned by the Controller or the Processor
Special Data	personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or personal data concerning a natural person's sex life or sexual orientation	information concerning Your political orientation, religious belief and health condition
Criminal Personal Data	personal data collected during or before the criminal proceedings in connection with the criminal offence or criminal proceedings by the bodies authorized to conduct criminal proceedings or detect criminal offences and in the law enforcement organization, related to the Data Subject and concerning criminal record	if the Data Subject has been convicted, if any proceedings are held against him, including the certificate of good conduct

### III. Identity of the Controller, Data Protection Officer and Processor

Controller of Your Personal Data: ADEXGO Kft.

**Controller's contact data:**

Registered seat: 9021 Győr, Sarkantyú köz 5., Hungary

Branches:

8230 Balatonfüred, Lapostelki út 13., Hungary

8230 Balatonfüred, Ifjúság utca 9., staircase B, floor 2, door 2, Hungary

1222 Budapest, Nagytétényi út 100.

Website: [www.adexgo.hu](http://www.adexgo.hu)

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

Phone: +3620/334 41 17

**Processors of ADEXGO Kft.:**

The Controller may transmit data to Processing enterprises and organizations in order to fulfil its system operational obligations. The Processor is not authorized to make any decisions on Processing in lack of the Controller's consent or to process the data for any other purposes but as defined by the Controller. The Processor may fulfil its duties only in accordance with the Controller's instruction. The Processor is obliged to make arrangements for the physical and software-related protection of the data to be processed, based on the rules in the IT Security Procedure of the Company (hereinafter ITS Procedure).

ADEXGO Kft. commissions the following Processing enterprises in the frames of its activity:

Processor's name	Contact data	Type of activity
HELVETIA CONSULTING Personnel & Accounting Consultancy Limited Liability Company	9021 Győr, Sarkantyú köz 5. +36 96/524-718	bookkeeping, payroll accounting, consulting external IT services
Dr. Lugosi Law Office	9021 Győr, Árpád út 3. +36 96/328-763	legal representation

You are respectfully informed that our Company will transmit Your Personal Data to third parties only with Your advance consent or in the frames of fulfilling a statutory obligation.

The Employees and Processors of the Company will have access to Your Personal Data to the extent and for the time necessary for their work and for the completion and fulfilment of their assignment, respectively.

## **IV. General Information on Personal Data Processing**

### **1. Typical scope of Personal Data processed**

Our Company processes Personal Data for several Processing purposes. It collects the majority of Personal Data from the Data Subject, i.e. You.

The Personal Data processed by our Company are typically the following: name, place and date of birth, residence, phone number, email address etc.

### **2. Title to Processing Your Personal Data**

#### **2.1. Consent-based Processing**

For instance:

If You like to contact us, You need to give us Your name, phone number and, potentially, Your email address so that we could provide You information in connection with Your questions.

#### **2.2. Processing, for the conclusion and fulfilment of contracts**

For instance:

Agreement and the exchange of information are both inevitable for contracting. To this end, You need to give us at least Your phone number and electronic contact details.

We might need Your address to fulfil a contract.

#### **2.3. Processing, to fulfil the legal obligations of ADEXGO Kft.**

For instance:

We need Your name and address to issue an invoice with the correct data content.

#### **2.4. Processing serves the protection of Your or another natural person's vital interests**

For instance:

Telephone notification in case of an accident, disaster, humanitarian emergency, epidemic.

#### **2.5. Processing, to enforce the legitimate interests of ADEXGO Kft. or a third party**

Cases of legitimate interest, for instance:

- protecting the life and bodily integrity of persons entering the area of the Company;
- accident prevention;
- property protection.

### **3. Purpose of Processing**

The purpose of Processing Your Personal Data may be, for instance:

- contacting, information supply;
- preparing the conclusion of a contract;
- fulfilment of a contract;
- meeting a statutory obligation;
- interest protection;
- property protection;
- protection of life and bodily integrity;
- marketing, business acquisition;
- complaint management.

## **V. Typical Types of Personal Data Processing in our Company**

### **1. Data processed for the establishment and during the existence of customer and business relations**

#### **1.1. Natural persons' (customers') data**

- Purpose of Processing: our Company sells products to, among others, natural persons, consequently, our Company processes the natural persons' (customers') specific Personal Data to support purchasing at the Company, the issuance of invoices, the customers' registration, their differentiation, the fulfilment of orders, the documentation of purchasing and payment, the fulfilment of accounting obligations, contact with the customers and to analyse customer habits.

- Legal ground of Processing: fulfilment of contracts (Section 6 (1) b) of GDPR) and fulfilment of the statutory obligation of the Controller as seller (Section 6 (1) c) of GDPR, Section 5 (1) b) of Privacy Act): Act C of 2000 on Accounting; Data Subject's consent with regard to other contact addresses (Section 6 (1) a) of GDPR, Section 5 (1) a) of Privacy Act).

- Scope of data processed: name, address, tax ID number, tax number, email address, phone number; date, time and place of purchasing; name, volume and price of product purchased; delivery address (for deliveries)

- Term of Processing: We process the customer's data for 5 years after the termination of the contract. We store the invoice for 8 years, in accordance with Act C of 2000 on Accounting. With regard to and in correlation with individual contact addresses, the data provided for contact purposes are processed until the withdrawal of the consent.

- Data transmission: to authorities, due to the fulfilment of statutory obligation.

#### **1.2. Data of a legal entity customer's contact person**

- Purpose of Processing: The Company processes the Personal Data of the contact person identified by the customer, to keep in contact with legal entity customers and to fulfil contracts.

- Legal ground of Processing: fulfilment of contracts (Section 6 (1) b) of GDPR).

- Scope of data processed: name, email address, phone number, job.

- Term of Processing: We store such data until the time information is collected about the termination of the right to keep in contact but for 5 years of terminating the business relation with the customer the latest.

- Data transmission: none.

### **1.3. Management of warranty and guarantee cases**

- Purpose of Processing: to fulfil the warranty and guarantee obligation regarding the product purchased by the Data Subject.
- Legal ground of Processing: fulfilment of Controller's statutory obligation (Section 5 (1) b) of Privacy Act, Section 6 (1) c) of GDPR): Act V of 2013 on the Civil Code.
- Scope of data processed: Data Subject's name, address, phone number, email address; data of the purchase (name, characteristics and price of the product; day, place and time of purchasing); complaint in connection with the purchased product.
- Term of Processing: 5 years of communication of the decision concerning the complaint.
- Data transmission: to authorities, due to the fulfilment of statutory obligation.

### **1.4. Complaint management (in writing in the complaint book, in email, by mail, on the phone in customer service, verbally)**

- Purpose of Processing: our customers' satisfaction with the products sold by the Company and with the selling process is a priority for our Company. If a customer is not satisfied with the activity of our Company and lodges a complaint against the Company, our Company will see into the complaint comprehensively and inform the Data Subject, the customer about the findings of this scrutiny.
- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR) and fulfilment of Controller's statutory obligation (Section 5 (1) b) of Privacy Act, Section 6 (1) c) of GDPR): Act C of 2000 on Accounting, Act CLV of 1997 on Consumer Protection.
- Scope of data processed: name, address, email address, phone number, tax ID number, tax number, product name and data, invoice data (time and place of purchase, product price), product photo (if necessary), complaint details.
- Term of Processing: We store the invoice for 8 years, in accordance with Act C of 2000 on Accounting. With regard to complaint investigation, we store the data for 5 years of communication of the decision.
- Data transmission: to authorities, due to the fulfilment of statutory obligation.

### **1.5. Camera surveillance system**

All Data Subjects are informed that our Company has camera surveillance and operates a camera surveillance system in accordance with Act CXXXIII of 2005 on the Rules of Protecting Individuals and Properties and the Activities of Private Investigators, in order to prevent accidents, protect human life, bodily integrity and personal freedom, for property protection and to safeguard hazardous materials.

- Purpose of Processing: The Company has camera surveillance mainly to prevent accidents, to protect human life, bodily integrity and personal freedom, for property protection and to safeguard hazardous materials.

- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR)

The consent can also be given with implicit behaviour. When You enter an area under camera surveillance despite the warning sign "Area under camera surveillance" shall be taken as implicit behaviour, unless the circumstances clearly conclude something else.

### **1.6. Card entry system**

- Purpose of Processing: Only duly authorized persons are entitled to enter the branch of the Company. The Company reserves the right to define the group of people entering its area. The purpose of Processing, beside staff registration, is life and property protection which is preconditional on having an exact understanding of the whereabouts and the number of persons staying within the area. The Company supplies the guests with an entry card, in the frames of running its electronic staff registration system.

- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR)

- Scope of data processed: card ID, time of entry and exit

- Term of Processing: The Company destroys the Data Subject's Personal Data prompt when the authorization to enter is terminated and, for data generated during system operation and in hard copy, after 6 months of the generation of the data the latest.

- Data transmission: none.

## **2. Processing during the online activity of the Company**

### **2.1. Using the website of the Company**

- Purpose of Processing: Any external visitor can have access to the website of the Company and the information supplied by the Company. When the website is visited, the hosting

provider of the website records the visitors' data to control service operation, prevent misuse and support functional operation. The purpose of recording is to collect information about website usage, make statistics and analyses on website and internet usage and enhance user experience by browser optimization. The website uses so-called cookies, so the user's actual visit can be linked with the former ones, the territorial settings, the language and the visitor's earlier website activities can all be remembered. The user may reject the application for cookies in the pop-up window in the website at any time.

- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR)
- Scope of data processed: date, time, user computer IP address, IP address of visited site, IP address of once visited site, data concerning the user's operation system.
- Term of Processing: term of visitor's permit (as long as visitor does not delete or cancel the enabling of cookies).
- Data transmission: none.

## **2.2. Wi-Fi services in the area of the Company**

- Purpose of Processing: The Company provides Wi-Fi service to its employees in the area of the Company. This is password protected and may only be used by persons having a password. Connecting to the Wi-Fi network, the users accept that the router would store their MAC ID, the name of the device and their assigned IP address.
- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR)
- Scope of data processed: MAC ID, public name of the device, IP address
- Term of Processing: duration of connection.
- Data transmission: none.

## **2.3. Promotion activity**

- Purpose of Processing: The Company can organize demonstration days and pursue advertising activities to introduce its undertaking activity and present the events organized by it, in order to contribute to the high-level visibility of the Company. To this end, the Company provides demonstration materials outlining its activity and organizes sponsored events where, based on their personal contribution and after giving their Personal Data, those interested can get information about the activity of the Company, about any supports granted to employees during their work or study period, about discounted sports and leisure time activities outside working hours, in person or via electronic means.

- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR)
- Scope of data processed: name, address, email address, phone number
- Term of Processing: until the withdrawal of the consent.
- Data transmission: any data transmission will be subject to special information supplied before the consent.

### **3. Contact**

#### **3.1. Contact on the website of the Company**

- Purpose of Processing: The Company offers an opportunity on its website for its potential partners to get in direct connection with the designated contact persons of the Company. The consent form in the website needs to be accepted in the checkbox to use the customer contact point.
- Scope of data processed: name, email address, phone number
- Legal ground of Processing: Data Subject's voluntary consent (Section 5 (1) a) of Privacy Act, Section 6 (1) a) of GDPR)
- Term of Processing: until the Data Subject's consent is withdrawn.
- Data transmission: none

#### **3.2. Processing Personal Data in CVs and motivation letters sent by post, electronically and in person**

- Purpose of Processing: The Controller offers an opportunity for applicants to send CVs and motivation letters to the Company in email, by post and in person, for the purposes of recruitment and to optimize the headcount.
- Legal ground of Processing: applicant's (Data Subject's) consent (Section 6 (1) a) of GDPR, Section 5 (1) of Privacy Act)
- Scope of data processed: Personal Data in CV, Personal Data in notes made in a personal hearing, documentation on aptitude test.
- Term of Processing: until the withdrawal of the applicant's consent but for 6 (six) months of the receipt of the CV the latest; if the application was successful, the CV and the motivation letter will be attached to the employee's personal file.

#### **4. Information about Processing for other purposes**

In case our Company intends to use the Data Subject's (Your) processed Personal Data for a purpose different from the above defined purpose of Processing, we will inform You of the different purpose and about any other information before starting to process for another purpose. The information will be supplied verbally (on the phone), during a personal meeting, through the delivery of written information or by sending written information via email (in case the email address is available).

## **VI. Data Security Measures**

The Company processes Personal Data on paper and electronically.

The data in hard copy are stored in the archives of the Company, in lockable filing cabinets that only the employees with a job defined in the internal rules can have access to.

Electronic Processing is carried out in compliance with the strict regulations stipulated in the IT Security Procedure; the actual IT employee can have access to the data, in addition to the employees with a job defined in the internal rules.

If You like to get information about the detailed rules, we will provide the excerpt of the IT Security Procedure to You at special request.

## VII. Data Transmission Abroad

You are respectfully informed that our Company transmits data abroad according to the following:

### 1. Data transmission within EEA

For the list of member states to the European Economic Area, please visit: <http://konzuliszolgalat.kormany.hu/egt-tagallamok>

Data transmission to an EEA member state will be considered as transmission within Hungary.

You are informed that Personal Data will only be disclosed to third parties in the cases laid down in legislation or with Your consent.

### 2. Data transmission outside EEA (to third country)

If we transmit Your Personal Data to a third country, we will pay enhanced attention to ensuring that both our Company as Controller and the Processor observed the provisions and fulfilled the conditions laid down in international and national legislation with reference to the protection of Personal Data.

You are respectfully informed that data could be transmitted to a third country in the below cases only:

- after Your express consent;
- in lack of consent, data may be transmitted only if each of the below conditions is fulfilled:
  - ◆ Controller has the title to process data; and
  - ◆ the third country the Personal Data are transmitted to has an acceptable level of protection in place.

### 3. Our Company will transmit data abroad in the below cases

Purpose: establish trading relations for marketing purposes, in the form of foreign market research; extend the R&D activity in the form of contacting foreign partners (cross-border research institutes, universities, similar profile enterprises)

Recipient country: (including but not limited to) Canada, Egypt, South Korea, Japan

Legal ground: marketing, contract preparation

## **VIII. Data Subject's Rights**

**With regard to Processing Your Personal Data, You have the following rights:**

### **1. Right of access**

At Your request, ADEXGO Kft. shall inform You if Your Personal Data are currently being processed, and if so, we shall give You access to the following:

- purpose of Processing;
- categories of Personal Data;
- Recipients or categories of Recipients that/who we have disclosed or we will disclose Your Personal Data to;
- the planned period of storing Your Personal Data, or if not feasible, the criteria of determining the period;
- information on how You can ask for the correction, deletion of the Personal Data relating to You or for limiting such Processing, and on Your right to object to Processing Your Personal Data;
- right to lodge a complaint;
- every information concerning the source, in case we did not get the data from You.

We shall make a copy of Your Personal Data processed by us available to You.

### **2. Right to rectification**

At Your request, ADEXGO Kft. shall rectify any inaccurate Personal Data concerning You and complete the incomplete data without any undue delay.

### **3. Right to erasure ("right to be forgotten")**

At Your request, ADEXGO Kft. shall erase the Personal Data concerning You without any undue delay.

The Company shall erase the Personal Data concerning You in the below listed cases:

- Your Personal Data are no longer necessary for us in relation to the purposes we collected or otherwise processed Your data for;
- You withdraw Your consent and there is no other legal ground for Processing;
- You object to Processing and there is no overriding legitimate ground for Processing, or You object to Processing with regard to Your data processed for direct marketing;
- we have processed Your Personal Data unlawfully;
- Your Personal Data have to be erased for compliance with a legal obligation in Union or Member State law ADEXGO Kft. is subject to.

#### **4. Right to restriction**

At request, ADEXGO Kft. shall restrict Processing Your Personal Data, provided one of the below listed cases apply:

- You contest the accuracy of Your Personal Data (in this case, restriction shall apply to the period enabling ADEXGO Kft. to verify the accuracy of Personal Data);
- Processing is unlawful but You oppose the erasure of the data and request the restriction of the use of Your Personal Data instead;
- ADEXGO Kft. no longer needs Your Personal Data, still, You require them for the establishment, exercise or defence of Your legal claim;
- You have objected to Processing Your data processed by ADEXGO Kft. for direct marketing (in this case, the restriction will apply to the period available to verify if the legitimate grounds of ADEXGO Kft. override those of Yours).

In case of restricting Processing, ADEXGO Kft. shall inform You about lifting the Processing in advance.

Where Processing has been restricted, the Personal Data shall, with the exception of storage, only be processed by ADEXGO Kft. with Your consent or for the establishment, exercise or defence of the legal claim of ADEXGO Kft. or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or a Member State.

#### **5. Right to object**

You shall have the right to object at any time to the Processing of Your Personal Data by ADEXGO Kft., if on grounds relating to Your consent or to exercising the legitimate interests of ADEXGO Kft. or a third party. In this case, ADEXGO Kft. shall no longer process Your Personal Data unless it demonstrates compelling legitimate grounds for the Processing which override Your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where ADEXGO Kft. processes Your Personal Data for direct marketing purposes, You shall have the right to object at any time to Processing for such a purpose. If You have objected, ADEXGO Kft. shall no longer process the Personal Data for this purpose.

#### **6. Right to data portability**

You shall have the right to ask for the transmission of the data supplied by You to us to either Yourself or another Controller, in a structured, commonly used and machine-readable format.

## **7. Right to withdrawal**

You shall have the right at any time to withdraw Your consent to Processing Your Personal Data by ADEXGO Kft. The withdrawal of the consent shall not affect the legality of pre-withdrawal Processing rested on Your consent.

## **8. Controller's procedure**

After having checked Your identity and after receiving the application, ADEXGO Kft. will be obliged to supply information to You without any undue delay but within one month the latest, in the format compliant with the application, unless You ask for another format.

The term may be extended with two months, with the proviso that the Controller will be obliged to inform You about the extended term within one month of receipt, after having defined the reason for the delay.

If the Controller fails to take measures in connection with Your request, You may exercise Your rights to legal remedy as set out in Section VIII of this Guide.

The fulfilment of the request for information is free of charge, as a general rule.

The Controller may refuse to fulfil the requests to exercise Your rights detailed above if it can prove its failure to identify You.

If Your request is clearly unsubstantiated or exaggerative, the Controller has the right to refuse to fulfil the request or may set a reasonable fee for the administrative costs generated on account of preparing the information. You will have to be informed about charging any administrative costs before fulfilling the request, so You will have the right to sustain, modify or withdraw Your request in this knowledge.

## **IX. Right to legal remedy**

### **1. Right to lodge a complaint at the supervisory authority**

If You think ADEXGO Kft. breached Your right when Processing Your Personal Data, You have the right to lodge a complaint at the supervisory authority without prejudice to other administrative or judicial remedies.

Based on a report, any person may initiate an investigation at the Hungarian National Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1055 Budapest, Falk Miksa utca 9-11., and/or 1363 Budapest, Pf.: 9; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) with reference to the violation of law in connection with the Processing of Personal Data or the exercise of rights to get to know data of public interest or data that are public for public interest, or the direct risk thereof.

You have the right to legal remedy against the decision of the supervisory authority.

### **2. Right to judicial remedy:**

You have the right to turn to the court to remedy Your breach if we did not process Your Personal Data according to the law.

You may as well prosecute the action at the tribunal competent at Your residence or place of stay, at Your choice.

The list of tribunals (name, contact data) and the service to identify competency are both accessible on the website [www.birosag.hu](http://www.birosag.hu).

Before initiating any procedure, the complaint should reasonably be sent to the Controller to one of the contact addresses in Chapter III of this Guide.

## **X. Updates of and Access to the Guide**

ADEXGO Industries, Trading and Services Limited Liability Company reserves the right to modify this Guide unilaterally, with effect after the modification. Considering this fact, the website [www.adexgo.hu](http://www.adexgo.hu) is recommended to be visited regularly so that You could monitor any changes. If we have Your email address, we can send You a notification concerning the modifications in an email, at request.

At Your request, we will send You a copy of the actually effective Guide.

## **XI. Personal Data Related to Third Parties**

If You are not legally entitled to provide any Personal Data on Your own, You are obliged to collect the relevant third parties' (e.g. legal representative, guardian, other person (e.g. consumer) on whose behalf You proceed) consent or to ensure any other legal grounds for providing the data. In this correlation, You are obliged to consider if any third party's consent is required in connection with providing the specific Personal Data.

ADEXGO Kft. might not get in personal connection with You, therefore, You are obliged to ensure compliance with this point and ADEXGO Kft. will not be held liable in connection with this. Regardless of the above, ADEXGO Kft. is entitled to check at any time if the due legal grounds for Processing any Personal Data are in effect.

If for instance You proceed on behalf of a third party (e.g. consumer), we are entitled to ask for Your authorization and/or the Data Subject's due consent to Processing regarding the specific case.

We make every reasonable effort to erase all the information supplied to us without authorization, and we ensure that this information will not be transmitted to others or used by us (whether for advertising or other purposes).

Please inform us without any delay if You see that a child provided Personal Data about him/herself or a third party about You, without due authorization.

You may contact us at any of the contact data in Point III of this Guide.

## **XII. Applicable legislation**

- **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)**
- **Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information**
- **Act CXXXIII of 2005 on the Rules of Protecting Individuals and Properties and the Activities of Private Investigators**
- **Act V of 2013 on the Civil Code**
- **Act C of 2000 on Accounting**
- **Act CL of 2017 on the Rules of Taxation (hereinafter Tax Act)**
- **Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities**
- **Act CLV of 1997 on Consumer Protection**