

Data Protection Notice

In this Privacy Notice, **Enitlab Kft.** (registered office: 8151 Szabadbattyán, Kertész u 17/c, company registration number: 07-09-017908, tax number: 12417874-2-07, email address: **info@enitlab.hu**) (hereinafter referred to as “**Enitlab**”) informs you about which personal data is processed or handled in connection with the use of the reporting function of the **enitlab.hu** website (hereinafter referred to as the “**Website**”).

This Notice sets out the following:

- how and what types of personal data we collect,
- provides information about how we collect,
- what we use your personal data for,
- explains when and for what purpose we share and/or transfer personal data.

This Notice serves as a guide to your rights and choices related to your personal data. It is important that personal data is processed only on the basis of the data provided by the user (including the Data Subject) when using the Website, and Enitlab Kft. does not collect other personal data in connection with the operation of the website. We provide an appropriate, high level of protection to prevent unauthorized access to and misuse of personal data. In order to protect and secure the personal data provided, we apply security procedures and technical and physical restrictions regarding access to and use of personal data on our servers, the purpose of which is to ensure that only authorized personnel have access to personal data.

This Notice applies to you if you use the Services (hereinafter referred to as the “Services”). Use of the Services means the following:

- **Contact Form**

This Notice also applies if you contact us or we contact you regarding our Services.

Your personal data is processed in accordance with the General Data Protection Regulation of the European Union (EU 2016/679, hereinafter referred to as “GDPR”) and other applicable data protection legislation implementing or supplementing it. In connection with the operation of the Website and for the purpose of performing tasks related to server hosting, the following acts as a data processor:

Fraternitas Kft. (Registered office: 8000 Székesfehérvár, Érsekújvári utca 12. 1. ajtó, Email address: **info@fraternitas.hu**)

1. Definitions

- **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, number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Data Controller:** the natural or legal person or organisation without legal personality which, alone or jointly with others, determines the purposes of the processing of data, takes and implements the decisions relating to the processing of data (including the means used) or has them implemented by a data processor on its behalf. The Data Controller is the company or organisation to which the Data Processor enables the submission of a report via the Website. In most cases, the Data Controller is the Data Processor's partner, which carries out its data processing activities on the basis of a contract for the provision of the service. The Data Controller is the entity listed in the header of the given notification form.
- **Data Processor:** a natural or legal person, public authority, agency, or any other body that processes personal data on behalf of the data controller. Enitlab acts as a data processor in relation to the enitlab.hu platform, and the basis of its procedure is to carry out its activities on behalf of and for the purposes of the Data Controller.
- **Data Processing:** any operation or set of operations performed on data, regardless of the method used, in particular recording, organisation, storage, alteration, use, retrieval, transmission, erasure and destruction, as well as preventing further use of data.
- **Data Breach:** a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored, or otherwise processed.

2. Data processing related to the use of the contact form

2.1 Sending a message to the Data Controller

Legal Basis for Data Processing:

For anonymous message sending (e.g., non-personalized email) data processing purposes, the legal basis for data processing and data transfer is the legitimate interest of the data controller, as stated in Article 6(1)(f) of the GDPR. For confidential reports, the legal basis for data processing is the consent of the data subject, as per Article 6(1)(a) of the GDPR, which can be withdrawn at any time by sending a statement to the data controller or data processor.

Duration of Data Processing:

During the processing of your personal data for specific purposes, we adhere to the principle of data retention limitation, meaning we only store personal data for as long as necessary, but no longer than five (5) years from the submission of the report.

Enitlab Ltd. processes personal data of third parties as long as the legal basis for the data processing is valid. The data may be stored for a longer period under the instructions of the data controller, for example, if data retention is reasonably necessary in connection with a specific case. In exceptional cases, such as in administrative proceedings or legal disputes, Enitlab Ltd. may retain documents containing personal data for a longer period to protect our legitimate interests, provided adequate guarantees are in place.

Data Storage Mode:

Electronic

Data Transfer:

Data is forwarded to the central email service of Enitlab Ltd. via the email system operated by Google LLC.

Rights Related to Data Processing:

As a data subject, you have the right to request information about the processing of your personal data, as well as the right to request the correction of your personal data and, except in cases of mandatory data processing, the deletion, withdrawal, exercise of data portability, and objection rights in the manner indicated during data collection or using the contact details provided in section I of this Privacy Notice.

Under Articles 15-20 of the GDPR, you have the following rights concerning your personal data:

- a) Right to information;
- b) Right of access;
- c) Right to rectification;
- d) Right to erasure;
- e) Right to restrict processing;
- f) Right to data portability;
- g) Right to object.

You can exercise your rights by sending a request to the contact details of the data controller.

Under the right of access, you can request information about whether your personal data is being processed and, if such processing is ongoing, you can access your personal data and be informed about the security measures regarding data processing.

Under the right to rectification, upon request, we will promptly correct inaccurate personal data and complete incomplete data.

Right to Erasure:

We will erase your personal data without undue delay in the following cases:

- a) If the personal data is no longer necessary for the purpose for which it was collected or otherwise processed;
- b) If the consent that forms the basis for processing is withdrawn, and there is no other legal basis for processing the data;

c) If the personal data has been processed unlawfully;

d) If we are required by law to erase the personal data.

We cannot erase personal data if processing is necessary for the establishment, exercise, or defense of legal claims.

Right to Object:

You have the right to object to the processing of your personal data at any time on grounds related to your particular situation.

Upon request, we will restrict the use of your personal data under the right to restriction of processing, in which case your personal data will only be used for specific purposes. You are entitled to request the data controller to restrict processing if any of the following conditions are met:

- You contest the accuracy of the personal data, in which case the restriction applies for the period necessary for the data controller to verify the accuracy of the personal data;
- The processing is unlawful, and you oppose the erasure of the data and request restriction of its use instead;
- The data controller no longer needs the personal data for processing purposes, but you require it for the establishment, exercise, or defense of legal claims;
- You have objected to the processing of the data; in this case, the restriction applies until it is determined whether the legitimate interests of the data controller outweigh your legitimate reasons.

Right to Data Portability:

Under the right to data portability, provided that it does not violate the rights and freedoms of others, we will send your data to you in a structured, commonly used, machine-readable format, and upon your request, we will transfer this data directly to another data controller.

In addition to the above, you are entitled not to be subject to decisions based solely on automated data processing, including profiling, which would have a legal effect on you or similarly significantly affect you, unless such a decision is necessary for the performance of a contract between you and the data controller, or is authorized by applicable EU or member state law, which also ensures appropriate measures for the protection of your rights and freedoms and legitimate interests, or is based on your explicit consent.

Right to Lodge a Complaint:

You have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (Headquarters: 1055 Budapest, Falk Miksa Street 9-11; Postal Address: 1374 Budapest, P.O. Box 603; Phone: +36-1-391-1400; Email: ugyfelszolgalat@naih.hu; Website: www.naih.hu) or with a court in the place of your residence or habitual abode.

Notification of Data Subject Regarding Data Protection Incident:

If a data protection incident is likely to result in a high risk to the rights and freedoms of natural persons, the data controller will inform the data subject without undue delay. The information provided to the data subject must clearly

and comprehensively describe the nature of the data protection incident, including the name and contact details of the data protection officer or another contact point for further information, the likely consequences of the data protection incident, and the measures taken or planned by the data controller to remedy the incident, including, where applicable, measures to mitigate the possible negative consequences of the incident.

The data subject does not need to be informed if any of the following conditions are met:

- The data controller has implemented appropriate technical and organizational protective measures, and these measures were applied to the data affected by the data protection incident, particularly those measures, such as encryption, that render the data unintelligible to unauthorized persons;
- The data controller has taken further measures after the data protection incident to ensure that the high risk to the data subject's rights and freedoms is no longer likely to occur;
- Providing the information would require disproportionate effort. In such cases, the data subject must be informed via publicly available information or a similar measure to ensure effective communication with the data subject.

If the data controller has not informed the data subject about the data protection incident, the supervisory authority may order the notification of the data subject after assessing whether the data protection incident is likely to result in a high risk.

Notification of Data Protection Incident to the Supervisory Authority:

The data controller must notify the supervisory authority without undue delay, and where possible, within 72 hours after becoming aware of a data protection incident, in accordance with Article 55, unless the data protection incident is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, reasons for the delay must be provided.

Changes to the Privacy Notice:

Any future changes to this Privacy Notice will be posted on the Website, and if applicable, the data subject will be notified by email. Please check the dedicated subpage on the Website to stay updated on all new updates and changes to the Privacy Notice.