

Privacy Policy

HST Management Private Limited Liability Company

I.) **General information about the data management information function**

CONIA Consulting and Trading Limited Liability Company (2200 Monor, Móricz Zsigmond utca 4.) (hereinafter CONIA Kft. or Data Controller), as a data controller, acknowledges the content of this data management information as binding for itself, and undertakes to all data management complies with the provisions of this data management information sheet and the applicable legislation. With its data management information, CONIA Kft. guarantees that it handles personal data in accordance with the relevant legislation and takes all security, organizational and technical measures that protect the security of the data.

THE CONIA Ltd. its data management principles are contained in this data management information sheet, which is in accordance with the applicable legislation related to data protection, with particular regard to the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Regulation 95/46/EC (general data protection regulation, hereinafter: **GDPR**)
- CXII of 2011 on the right to information self-determination and freedom of information. law (hereinafter: **Infotv**).

This data protection information is continuously available on the website of CONIA Kft., under the address www.coniakft.com . CONIA Kft. reserves the right to unilaterally change this information. In any case, the affected parties will be informed of possible changes in good time before the change is made, via their legally managed e-mail address or via our website.

If you have any questions about our data protection information, please write to us on the website www.coniakft.com under the Contact menu, or to the e-mail address info@coniakft.com, or contact us by phone.

II.) **Data of the data controller:**

Company name: CONIA Kft.

Headquarters: 2200 Monor, Móricz Zsigmond utca 4.

Company registration number: 13-09-202828

Telephone number: +36-30/503-15-08

E-mail address: info@coniakft.com

III.) **Data processors contributing on behalf of the data controller:**

- Proactive Business Zrt.

- MiniCRM Zrt.
- HST Management Zrt.

IV.) **Concepts used in the prospectus**

Personal data : any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;

The consent of the data subject : the voluntary, specific and clear declaration of the will of the data subject based on adequate information, with which the data subject indicates by means of a statement or an act clearly expressing the confirmation that he gives his consent to the processing of personal data concerning him;

Objection : the statement of the data subject objecting to the processing of their personal data and requesting the termination of the data processing or the deletion of the processed data;

Data controller : the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or together with others; if the purposes and means of data management are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be determined by EU or member state law;

Data management : any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, organization, segmentation, storage, transformation or change, query, insight, use, transmission, distribution or otherwise making it available through, alignment or connection, restriction, deletion or destruction.

Data transmission : making the data available to a specific third party;

Disclosure : making the data available to anyone;

Data deletion : making data unrecognizable in such a way that their recovery is no longer possible;

Data processing : performing technical tasks related to data management operations, regardless of the method and tool used to perform the operations, as well as the place of application, provided that the technical task is performed on the data;

Data processor : the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller;

Third party : the natural or legal person, public authority, agency or any other body that is not the same as the data subject, the data controller, the data processor or the persons who have been authorized to process personal data under the direct control of the data controller or data processor.

V.) **Our data management principles in general**

1. legality, due process and transparency
2. purposefulness
3. data saving
4. accuracy
5. limited storage capacity
6. integrity and confidentiality
7. accountability

The processed personal data must meet the following requirements:

1. their admission and treatment is fair and lawful;
2. are accurate, complete and, if necessary, timely;
3. the way they are stored is suitable for identifying the data subject only for the time necessary for the purpose of storage.

We can only transfer personal data and combine different data management processes if you have expressly consented to it or if the law allows it, and if the above conditions for data management are met for each individual piece of personal data.

The court, the prosecutor and the investigative authority, or other bodies based on legal authorization, may contact **CONIA Kft.** for the purpose of providing information, communicating and handing over data, or making documents available. In the request, the exact purpose of the data management and the scope of the requested data must be indicated. The request may only refer to such personal data as is absolutely necessary to achieve the purpose of the request.

CONIA Kft. is partly based on the clear and voluntary consent of the data subject and partly on the law. In the case of data management based on consent, consent can be withdrawn at any time.

The processing of personal data is legal if one of the following conditions is met:

1. the data subject has given his consent to the processing of his personal data for one or more specific purposes;

2. the data processing is necessary for the fulfillment of a contract in which the data subject is one of the parties, or it is necessary for taking steps at the request of the data subject prior to the conclusion of the contract;
3. data management is necessary to fulfill the legal obligation of the data controller;
4. data processing is necessary to enforce the legitimate interests of the data controller or a third party, unless these interests are overridden by the interests or fundamental rights and freedoms of the data subject that require the protection of personal data, especially if the data subject is a child.

We draw the attention of informants that if they do not provide their own personal data, the informant is obliged to obtain the consent of the data subject/data subject.

VI.) The purpose, legal basis and duration of personal data management in connection with each specific data management

6.1. Management of user/customer data

Range of processed data: full name, telephone number, e-mail address, billing name and address

Purpose of data management: Clear identification of users using the services of **CONIA Kft.** , **provision of the service to those entitled to it.**

The legal basis for data management: the fulfillment of the contractual obligation, possibly the enforcement of the Data Controller's legitimate interests.

Personal data used for invoicing are handled in accordance with the provisions of the Accounting Act in order to fulfill legal obligations.

Duration of data management: the data will be deleted from our system after a maximum of 5 years following the termination of the existing contract between us. An exception to this is the range of data used for invoicing, which must be kept for 8 years from the date of the invoice in order to comply with the legal requirements for accounting, so if five years after the termination of the contract have passed before the end of this period, the data must be deleted at the earliest after the 8-year time interval has expired. may take place.

6.2 Telephones and electronic correspondence related to our services

Scope of processed data: full name, telephone number and/or e-mail address (depends on the method of contact)

CONIA Kft. we are at the disposal of both our customers and potential customers at the contact details found under the Contact menu item on the website www.coniakft.com or at the e-mail address info@coniakft.com.

Your personal data provided on this interface is handled in two ways, depending on whether

a) You are already our customer:

6.1. specified in point 2 apply to the processing of your personal data, both in terms of its legal basis and the purpose and duration of the processing.

b) You are our future customer or just interested:

Scope of processed data: same as above

Purpose of data management: providing an accurate, comprehensive answer to your inquiry

Legal basis for data management: your clear consent

Duration of data management: if you do not want to be our customer based on our answer, we will immediately and automatically delete you from our register after answering. In case of becoming our customer, see 6.1. point.

6.3 Storage and security of personal data

CONIA Kft. 's computer systems and other data storage locations are located at its headquarters. The servers are protected by multiple firewalls, and their operation is carried out by a staff member of our company who has this responsibility.

CONIA Kft. takes into account when selecting, purchasing and operating its IT tools, and ensures that the processed personal data is accessible only to authorized persons, its origin can be verified and it is authentic.

CONIA Kft. does its best against computer-supported fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, computer intrusions and denial-of-service attacks, and CONIA Kft. ensures security with server-level and application-level protection procedures .

VII.) Remedies

7.1 When in doubt, please contact us.

Pursuant to the relevant rules, you have the following options in relation to asserting your right to your personal data.

1. *The right to request information* : You can request information from us via the provided contact details about what data our company processes, on what legal basis, for what data management purpose, from what source, and for how long. Upon your request, we will send information to the e-mail address you provided without delay, but within 30 days at most.
2. *Right to rectification* : You can ask us to change any of your data via the contact details provided. Upon your request, we will take action on this immediately, but within 30 days at most, and we will send information about taking the action to the e-mail address you provided.
3. *The right to deletion* : You can ask us to delete your data via the contact details provided. At your request, we will do this immediately, but within 30 days at most, and we will send information to the e-mail address you provided. We would like to inform you that the data processed due to the obligation of the Data Controller and the data necessary for the performance of the contract cannot be deleted until it exists.
4. *The right to blocking* : You can ask us to block your data via the contact details provided. The blocking lasts as long as the reason indicated by you makes it necessary to store the data. At your request, we will do this immediately, but within 30 days at most, and we will send information to the e-mail address you provided.
5. *The right to object* : You can object to data processing via the contact details provided. We will examine the objection as soon as possible, but no later than 15 days after the submission of the application, we will make a decision on its merits, and we will inform you of the decision by e-mail.

If you experience data processing that you believe to be illegal, notify our company so that it is possible to restore the legal status within a short period of time. In your interest, we will do everything we can to resolve the outlined problem.

7.2 National Data Protection and Freedom of Information Authority

At the Authority, anyone can initiate an investigation on the basis that a violation of rights has occurred in connection with the handling of personal data, or there is a direct risk of such violation.

Contact details of the Authority:

Headquarters : 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Web: www.naih.hu

7.3 Court enforcement

In the event of a violation of their rights, the data subject may apply to court against **CONIA Kft** . The court acts out of sequence in the case.

The adjudication of the lawsuit falls under the jurisdiction of the Metropolitan Court, but according to its decision, it can also refer to the court with jurisdiction and jurisdiction in its own place of residence.

Regarding points not analyzed in detail in this information, Infotv. and the provisions of the GDPR are governing.

Budapest, November 14, 2023.