

**MELIOR LASER Kereskedelmi és Szolgáltató Korlátolt
Felelősségű Társaság**

PRIVACY POLICY FOR THIRD PARTIES

Effective date: 28 September 2018

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1 GENERAL PROVISIONS

1.1 The Purpose of the Policy

The purpose of this policy (hereinafter the "Policy") is to provide information regarding data processing by **MELIOR LASER Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság** (registered seat: 2051 Biatorbágy, Tormásrét utca 5/b., Cg. 13-09-124831, represented by László Lendvai Managing Director, tax number: 12962642-2-13, e-mail address: info@meliorlaser.hu, website: www.meliorlaser.hu (Website), hereinafter the **Company** or **Controller**).

1.2 The Scope of the Policy

The Policy shall apply to the personal data of the natural persons affected by the data processing activities of the Company stipulated in this Clause (hereinafter the Data Subjects).

The data processing activities of the Company are as follows:

- (1) data processing through the menu item "CONTACT US" on the Website,
- (2) data processing through the menu item "JOB OFFERS" on the Website,
- (3) data processing through the sub-item "Ask for sheet metal fabrication quote" of the menu item "SHEET METAL FABRICATION" on the Website,
- (4) data processing through storing the data of business partner contacts in an electronic database.

1.3 Availability of the Policy

The Policy in its current versions is available in a hard copy at the registered seat of the Company indicated in Clause 2.1, and in an electronic format on the Website, under "Privacy Policy".

1.4 Amendments to the Policy

The Company may unilaterally amend the Policy (if necessary) without prior notice and with effect from the date of amendment. Data Subjects shall be notified about the amendment to the Policy through the contact details specified in Clause 2.3.

1.5 Governing Law

The Company represents and warrants that its data processing is in compliance with the provisions of the Policy and the laws in effect from time to time [including but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter the **GDPR**) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter the **Information Act**)].

1.6 Definitions

Terms used with capital letter in the Policy and otherwise not defined shall have the meaning ascribed to them in the laws defined in Clause 2.5.

1.7 Authenticity, Accuracy of the Personal Data

The personal data shall be provided by the Data Subjects to the Company. The Data Subjects shall be liable for the authenticity, accuracy of the personal data provided in any way to the Company. The Company assumes no liability for the consequences arising from defective disclosure or defective data, such liability is hereby expressly excluded.

1.8 Data Security

The Company is dedicated to the protection of the personal data provided by Data Subjects, it considers it of primary importance to respect the informational self-determination of the Data Subjects. Personal data shall be kept confidential by the Company, and the Company shall take all security, technical and organisational measures to ensure the security of the personal data.

2 CERTAIN DATA PROCESSING

Data processing by the Company for different purposes are presented in separate tables.

2.1 Data processing through the menu item “CONTACT US” on the Website [managing inquiries]

Table No. 1

1.	Description of Data Processing:
	Data Subjects can send the Company electronic messages under “CONTACT US” for the purpose of inquiries/communication. The sender of the inquiry is the Data Subject.
2.	Personal data processed:
	1. name
	2. e-mail
	3. telephone number
	4. subject
	5. message
3.	The Purpose of the Processing:
	Managing and responding to inquiries, sales related administration.
4.	The Legal Bases of the Processing:
	Data processing is based on Article 6(1) b) of the GDPR , i.e. data is processed for the purpose of taking steps to enter into, to conclude the contract with the Company, to perform the contract, and to settle claims (if any) related to performance.
5.	Duration of the Processing:
	Inquiries shall be stored by the Company for up to 12 months from receipt, then they are

	deleted save for inquiries that are still pending which will be deleted after the 12 month following closing of the inquiry expires.
6.	Processor:
	MediaCenter Hungary Kft. (registered seat: 6000 Kecskemét, Sosztakovics u. 3. II/6., Cg. 03-09-114492, represented by Csaba Ronkó, Managing Director, hosting service provider)

2.2 Data processing through the menu item “JOB OFFERS” on the Website [retaining applications, resumes]

Table No. 2

1.	Processing Operations:
	Resumes, cover letters, applications (hereinafter jointly referred to as Application) are collected by the Company through two channels: (I) transfer from recruitment companies and/or (II) through the “JOB OFFERS” on the Website www.meliorlaser.hu. The “JOB OFFERS” menu item allows natural persons (hereinafter the Applicant) to submit and disclose their Application directly to the Company for (1) an actual position or (2) in general without an actual position being indicated. The Applications received by the Company are recorded and stored in a structured form. The receipt of the Applications through the “JOB OFFERS” are confirmed by the Company in an automatic confirmation sent by the Company to the e-mail address of the Applicant.
2.	Personal data processed:
	Name, e-mail address, telephone number and all personal data indicated in the Application attached, including but not limited to the highest level of education, language skills, professional experience, address. If the Company identifies sensitive personal data, such shall be immediately erased unless processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Company or the Applicant in the field of employment and social security and social protection law.
3.	The Purpose of the Processing:
	To recruit new employees for positions open and/or becoming open at the Company.
4.	The Legal Bases of the Processing:
	[Article 6(1)a) of the GDPR] data subject’s (Applicant’s) consent
	Withdrawal of consent:
	The Applicant shall have the right to withdraw its consent at any time as a result of which its Application shall be immediately deleted by the Company. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal of the consent may be effected by the Applicant in writing with a free text notice delivered to any of the contact information of the Company stipulated in Chapter IV of this Policy. The withdrawal of the consent shall enter into force upon the Company becoming aware thereof.
5.	Duration of the Processing:
	(I.) If the Applications are transferred to the Company by a recruitment company, the data processing period shall be the application period, i.e. the time from the Applicant’s consent to the closing of the application process. The Company shall erase the personal data (Application) of the Applicants not selected, immediately after the position is filled in, but not later than three months after the Application deadline, even if the Applicant withdraws its Application during the application

	<p>process. If the Company wishes to keep the Application of Applicants not selected even after the closing of the application process, it shall notify the Applicant in advance, in particular about the purpose and duration of such data retention, then it shall obtain the Applicant's consent in which case it may continue to process that Application for a fixed period of three months from the date of such consent and after the expiry of such period the Application shall be deleted, even if the Applicant's consent is withdrawn during such period.</p>
	<p>(II.) If the Applications are retained through the "JOB OFFERS" on the Website:</p> <p>(1) For actual positions: The Company shall in all cases define a deadline for submitting the Application. The Company shall decide on the results of the application process, the selection of the Applicant suitable for the relevant position and closing the application process within three months following the expiry of such deadline. The results of the Application process shall be communicated by the Company to the Applicants. The data processing period shall be the application period, i.e. the time from the Applicant's consent to the closing of the application process. The Company shall erase the personal data (Application) of the Applicants not selected, immediately after the position is filled in, but not later than three months after the application deadline, even if the Applicant withdraws its Application during the application process. If the Company wishes to keep the Application of Applicants not selected even after the closing of the application process, it shall notify the Applicant in advance, in particular about the purpose and duration of such data retention, then it shall obtain the Applicant's consent in which case it may continue to process that Application for a fixed period of three months from the date of such consent and after the expiry of such period the Application shall be deleted, even if the Applicant's consent is withdrawn during such period.</p> <p>(2) For no specific positions: the Application shall be deleted by the Company after the expiry of the fixed term of three months from the date of the consent, even if the Applicant's consent is withdrawn during such period. Should the Company decide to launch a new application process during the three-month period and it decides to use the Application, processing by the Company shall be governed by the provisions stipulated in paragraph (1).</p>
7.	Processor:
	<p>CNW Rendszerintegrációs Zártkörűen Működő Részvénytársaság (registered seat: 1181 Budapest, Wlassics Gy. u. 50., Cg. 01-10-044028, 11796770-2-43, represented by István Fekete, CEO, e-mail: office@cnw.hu, website: www.cnw.hu, server maintenance service provider)</p>
8.	Applications may be accessed by: HR consultants, marketing consultants, executive manager

2.3 Data processing through the sub-item "Ask for sheet metal fabrication quote" of the menu item "SHEET METAL FABRICATION" on the Website

Table No. 3

1.	Description of Data Processing:
	<p>The sub-item "ASK FOR SHEET METAL FABRICATION QUOTE" of the menu item "SHEET METAL FABRICATION" on the Website of the Company may be used by any non-natural person (hereinafter the Procurer) to request a quote from the Company regarding sheet</p>

	<p>metal fabrication, or to send electronic messages to the Company regarding such quote. With the acceptance of the Company's quote by the Procurer and the official confirmation of the Company, i.e. with the acceptance of the order, a contract is concluded between the Procurer and the Company. The personal data of the natural person contact person of the Procurer (hereinafter the Data Subject) is indispensable for the preparation, conclusion and performance of such contract. The Company hereby states that it can only issue quotes to non-natural person Procurers and the relevant processing governed by the GDPR is performed only by recording the contact details of the contact appointed by the non-natural person Procurer. The Data Subject shall be the contact of the Procurer.</p>
2.	Personal data processed:
	1. name
	2. telephone number
	3. e-mail
	4. message
3.	The Purpose of the Processing:
	<p>The purpose of processing the personal data of the contact to the non-natural person Procurer is to contact/communicate with the Procurer, to submit a quote to the Procurer and to conduct further negotiations regarding the quote. The negotiations regarding the quote and the terms quality as preparation for the conclusion of the contract.</p>
4.	The Legal Bases of the Processing:
	<p>Processing shall be based on Article 6(1)b) and f) of the GDPR, i.e. processing is required to prepare for the conclusion of the contract between the Procurer and the Company, to execute the contract, and also to enforce the legitimate interest of the Company to communicate with the Procurer, to hold negotiations regarding the quote which is only possible through the contact person appointed by the Procurer. However, the protected right of the Data Subject may be its right to privacy, but the right and legitimate business interest of the Company to submit a quote and prepare for the conclusion of the contract, is stronger than such right to privacy. The Data Subject's right to privacy will not be violated since the contact details (e-mail address, telephone number) given to the Company are most probably data provided by the Procurer. The right to privacy is also outweighed by the Data Subject's obligation to comply with its job related responsibilities and to act in the interest of the Procurer.</p>
5.	Duration of the Processing:
	<p>If no contract is concluded as a result of the quote, the preparation of the contract, the correspondence, the Data Subject's data, the correspondence (if any) will be stored by the Company for up to 1 year for future communication, business partnership, contracts. It is the Company's legitimate interest to have the contact details of the Data Subject available in the future that will allow communication and contracting which is in the interest of both the Company and the Procurer.</p>
6.	Rights of the Data Subject:
	The rights stipulated in Chapter III of the Policy.
7.	Enforcing the rights of the Data Subject:
	As per the provisions of Chapter IV of the Policy.
8.	Processor:
	MediaCenter Hungary Kft. (registered seat: 6000 Kecskemét, Sosztakovics u. 3. II/6., Cg. 03-09-114492, represented by Csaba Ronkó, Managing Director, hosting service provider)

2.4 Data processing through storing the personal data of business partner contacts in an electronic database

Table No. 4

1.	Description of Data Processing:
	The data of the non-natural person business partners are stored by the Company in an electronic database. The recorded data of the business partners include the name and contact information (telephone number, e-mail address) of the natural person contact of the business partner (hereinafter the Data Subject). With respect to its business partners, the Company only performs data processing subject to the GDPR in this regard, considering the fact that business partners are not natural persons. The Data Subject is the contact of the business partner.
2.	Personal data processed:
	1. name
	2. telephone number
	3. e-mail
3.	The Purpose of the Processing:
	There is a contractual relationship between the Company and its business partners. The purpose of processing the personal data of the Data Subject is to prepare the contracts to be concluded with the business partners, to execute the contract, to perform the contract concluded, to perform the related administrative tasks, to communicate and to enforce the Company's claims against the business partner through the Data Subject.
4.	The Legal Bases of the Processing:
	Processing shall be based on Article 6(1)b) and f) of the GDPR , i.e. processing is required to prepare for the conclusion of the contract between the Company and the business partner, to perform the contract concluded, and also to enforce the legitimate interest of the Company to communicate with the business partner, to comply with its contractual obligations which is only possible through the Data Subject appointed by the business partner. However, the protected right (if any) of the Data Subject may be its right to privacy, but the right and legitimate business interest of the Company to ensure the completion of the contract between the Company and the business partner, is stronger than such right to privacy. The Data Subject's right to privacy will not be violated since the contact details given to the Company are most probably data provided by the business partner. The right to privacy is also outweighed by the Data Subject's obligation to comply with its job related responsibilities and to act in the interest of the business partner.
5.	Duration of the Processing:
	The data of the business partner are processed by the Company during the term of the contract, until the performance of the contract, or then for a fixed period of 8 years pursuant to Section 169 of Act C of 2000 on Accounting, until the time of prescription under the tax laws expires as defined in Section 47(3) and 164 of Act XCII of 2003 on Taxation (Old Tax Act) before 31 December 2017, while after 1 January 2018 in Section 78(3) and 202 of Act CV of 2017 on Taxation (New Tax Act). The personal data of the Data Subject will be processed accordingly for the term defined above.
8.	Processor:
	Corvex Üzleti Megoldások Zrt. (registered seat: 2014 Csobánka, Hanfland körút 21, represented by Pál Bíró, Chief Executive and/or Lajos Kovács, CEO)

3 RIGHTS OF THE DATA SUBJECT

In connection with processing the Data Subject is entitled to the following rights.

3.1 Right to information

The Data Subject shall have the right to receive information with respect to its personal data processed by the Company, about all facts related to processing prior to the commencement of the processing. Considering that the Data Subject's personal data are given to the Company by the Data Subject itself, the Company complies with its obligation to provide information as stipulated in Article 13 of the GDPR with this Policy.

3.2 Right to access (Article 15 of the GDPR)

The Data Subject may at any time request information from the Company about precisely which of its personal data are processed by the Company. At the Data Subject's request the Company shall provide information about the purposes, legal basis, period of the processing, and also about the recipients to whom the personal data are or have been (in particular recipients in third countries or international organisations, if any) and the purpose of such disclosure. The Data Subject has the right to be granted access and it has the right to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing. The Data Subject has the right to request information about the supervisory authority where it can lodge a complaint. In case of data not obtained from the Data Subject, the Data Subject may request information regarding the source of such data. Where the personal data are transferred by the Company to a third country or to an international organisation, the Company shall inform the Data Subject also about the appropriate safeguards taken pursuant to Article 46 of the GDPR relating to the transfer.

The first copy of the personal data processed shall be provided by the Company to the Data Subject free of charge. For any further copies, the Company may charge a reasonable fee based on administrative costs subject to the volume of data, however, the costs shall be communicated to the Data Subject in advance. Where the Data Subject makes the request for information/access by electronic means, and unless otherwise requested by the data subject, the information shall be provided by the Company to the Data Subject in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

3.3 Right to rectification, completion (Article 16 of the GDPR)

The Data Subject has the right to request the Company to rectify personal data recorded inaccurately or defectively. Should the data be incomplete as far as the purpose of the processing is concerned, the Data Subject may request the completion thereof. If the data requested to be rectified or completed is a data recorded in an official card for personal identification and for proving address, or in some other public records, such document shall be presented for the purpose of the rectification or completion.

3.4 Right to erasure (“right to be forgotten”) (Article 17 of the GDPR)

The Data Subject shall have the right to request the Company to erase its personal data, and the Company shall comply with such request 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 Data Subject withdrew consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the Data Subject objects to data processing by the Company for public interest or legitimate grounds pursuant to Article 21(1) of the GDPR, and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing for direct marketing purposes, pursuant to Article 21(2) of the GDPR;
- d) the personal data have been unlawfully processed by the Company;
- 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 personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

Where the personal data was disclosed by the Company, and the Company is required to erase them, it shall use its best endeavours to notify all further controllers processing the data about the obligation to erase the relevant personal data.

The data shall not be erased if data processing is required:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation (e.g. tax and accounting liability) which requires processing by law to which the Company is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
- c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of the GDPR;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

3.5 Right to restriction of processing (Article 18 of the GDPR)

The Data Subject shall have the right to obtain from the Company restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, for a period enabling the Company to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject 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 they are required by the Data Subject for the establishment, exercise or defence of legal claims;

- d) the Data Subject objected to the processing pursuant to Article 21(1) of the GDPR and the Company needs time to ascertain if there are overriding legitimate grounds for the processing. In such a case the restriction shall apply until it is established if there is an overriding legitimate ground for processing, i.e. if the legitimate grounds of the Company to keeping and processing the data are overriding the legitimate grounds of the Data Subject to data erasure.

During the period of restriction the data shall only be stored by the Company, and no other processing operations may be conducted thereon, unless i) the Data Subject consents to such further operations, or ii) processing is required for the establishment, exercise or defence of legal claims or iii) for the protection of the rights of another natural or legal person or iv) for reasons of important public interest of the Union or of a Member State.

In case of restriction, the Company shall notify the Data Subject in advance about the limitation being lifted in the form and manner used by the Data Subject to request the restriction of the processing.

The Company shall communicate any rectification or erasure of personal data or restriction of processing requested by the Data Subject and carried out the Company to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. At the Data Subject's request the Company shall notify the Data Subject about the recipients it notified as stipulated above.

3.6 Right to object (Article 21 of the GDPR)

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on public interest, or the need to enforce the legitimate interests of the Company or a third party (Article 6(1) e) and f) of the GDPR), including profiling based on those provisions. The Company shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

The Data Subject shall have the right to object at any time to processing of personal data concerning the Data Subject for direct marketing purposes, which includes profiling (of which (if any) the Company shall duly and properly inform the Data Subject) to the extent that it is related to such direct marketing. In case of objection, the personal data shall not be processed by the Company for direct marketing purposes.

Where data is processed for statistical purposes the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

3.7 Right to data portability (Article 20 of the GDPR)

Considering that the Data Subject's data are stored by the Company in an electronic database, the Data Subject shall have the right to receive the personal data concerning him or her, which he or

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. The Data Subject's right to data portability shall apply to data that are processed based on the Data Subject's consent (Article 6(1) a) or Article 9(2) a) of the GDPR) or the performance of the contract (Article 6(1) b) of the GDPR). Where the Data Subject requests the direct transfer of the personal data between controllers, the Company shall notify the Data Subject if such is technically possible.

3.8 Right to lodge a complaint with a supervisory authority (Article 77 of the GDPR)

Without prejudice to any other administrative or judicial remedy, every Data Subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the Data Subject considers that the processing of personal data relating to him or her infringes the provisions of the GDPR.

The supervisory authority in Hungary shall be: **Hungarian National Authority for Data Protection and Freedom of Information (1024 Budapest, Szilágyi Erzsébet fasor 22/C., e-mail: ugyfelszolgalat@naih.hu, +36-1-3911400, president: dr. Péterfalvi Attila, www.naih.hu).**

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78 of the GDPR.

3.9 Right to an effective judicial remedy against a supervisory authority (Article 78 of the GDPR)

Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority (the Hungarian National Authority for Data Protection and Freedom of Information in Hungary) concerning them. Without prejudice to any other administrative or non-judicial remedy, the Data Subject shall have the right to an effective judicial remedy where the supervisory authority which is competent pursuant to Articles 55 and 56 of the GDPR does not handle a complaint or does not inform the Data Subject within three months on the progress or outcome of the complaint lodged pursuant to Article 77. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established (in Hungary in case of court actions against the Hungarian National Authority for Data Protection and Freedom of Information, the Administrative and Labour Court of Budapest has competence and jurisdiction).

3.10 Right to an effective judicial remedy against the Company or processor (Article 79 of the GDPR)

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Clause 4.8, the Data Subject shall have the right to file for legal action where it considers that its rights under the GDPR have been infringed by the Company as a result of the processing of its personal data in non-compliance with the GDPR.

The legal action shall be filed for before the court of the Member State in which the Company pursues its business, i.e. in Hungary. Alternatively, such proceedings may be brought before the courts of the Member State where the Data Subject has its habitual residence (if it is not Hungary).

3.11 Communication of a personal data breach to the Data Subject (Article 34 of the GDPR)

When the personal data breach is likely to result in a high risk to the rights and freedoms of the Data Subject, the Company shall communicate the personal data breach to the Data Subject without undue delay. This Policy shall describe in clear and plain language the nature of the personal data breach and contain at least the following information and measures:

- a) communicate the name and contact details of the data protection officer or other contact points where more information can be obtained;
- b) describe the likely consequences of the personal data breach;
- c) describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The Data Subject shall not be notified about the personal data breach if any of the following conditions applies:

- a) the Company has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- b) the Company has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;
- c) it would involve a disproportionate effort.

In such a case, there shall instead be a public communication or similar measure whereby the Data Subject is informed in an equally effective manner.

4 ENFORCING THE RIGHTS OF THE DATA SUBJECT, SUBMITTING ITS APPLICATION, COMMUNICATION WITH THE COMPANY

Where the Data Subject wishes to enforce its rights, it shall if possible send its inquiry i) in writing, by post ii) in person to the registered seat of the Company or iii) via e-mail to the e-mail address of the Company.

Data, contact information of the Company/Controller:

company name: **MELIOR LASER Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság**

registered seat: 2051 Biatorbágy, Tormásrét utca 5/b

company registration number: Cg. 13-09-124831,

represented by László Lendvai, Managing Director

tax number: 12962642-2-13,

e-mail: info@meliorlaser.hu

website: www.meliorlaser.hu

Where there is any doubt regarding the identity of the Data Subject, or where the data given are not satisfactory for confirming the identity, the Company may request the Data Subject to submit further identification data as may be necessary and suitable for confirming the identity of the Data Subject.

If the person filing the request cannot prove its identity beyond doubt, and therefore such person cannot be identified, the Company may refuse to process its request.

The Company shall provide information on action taken on a request to the Data Subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

Where the Data Subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

If the Company does not take action on the request of the Data Subject, the Company shall inform the Data Subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Information provided under Articles 13 and 14 of the GDPR and any communication and any actions taken under Articles 15 to 22 and 34 shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:

- (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- (b) refuse to act on the request.

Budapest, 28 September 2018