

## Data Processing Statement

### *Related to the Mészáros Group Website*

This document aims to provide information regarding the processing of personal data through the Mészáros Group Website (hereinafter: "Website"). The notice is prepared in accordance with 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).

#### THE DATA CONTROLLER

Company Name:

Talentis Group Zrt. (hereinafter: "Data Controller")

Registered address: H-8086 Felcsút, Fő utca 65.

Co. reg. number: 07-10-001621

Tax ID: 23029132-2-07

Represented by: the Members of the Board of Directors

E-mail address: info@meszaroscsoport.hu

#### **1. THE PURPOSE OF DATA PROCESSING, CATEGORIES OF DATA SUBJECTS, LEGAL BASIS FOR DATA PROCESSING, SCOPE OF DATA PROCESSED BY THE DATA CONTROLLER, RETENTION PERIOD**

<b><i>Data Processing Related to Messages Sent to the Contact Email Address</i></b>	
<b>The purpose of data processing:</b>	The purpose of data processing is to facilitate communication between the Data Subject and the Data Controller via the email addresses provided in the "Contact" section of the Website. Messages sent by the Data Subject are processed to allow the Data Controller to respond appropriately based on the content of the message.
<b>Categories of Data Subjects:</b>	Data Subjects include natural persons who send messages to the contact e-mail address posted on the Website.
<b>Legal grounds of data processing:</b>	The processing of personal data is based on the Data Subject's voluntary consent, in accordance with Article 6(1)(a) of the GDPR.  Consent is granted by sending a message to the contact email address. While submitting personal data is not mandatory, failure to do so will prevent the establishment of contact and response to the message.

<b>Categories of Personal Data:</b>	The categories of personal data corresponds to the personal data provided voluntarily by the Data Subject during the communication process. The Data Controller does not define mandatory data categories.
<b>Period of Data Processing:</b>	<p>Personal data related to the received message is retained by the Data Controller for 30 days after its receipt. The Data Controller responds to the message within 15 days in its merits and sends the reply to the Data Subject. If the Data Subject does not reply within 30 days of receiving the response, the Data Controller verifies this within 15 days and then deletes the associated personal data. If an automated notification received by the Data Controller after the sending of the response indicates that the e-mail address is invalid or no longer belongs to the Data Subject, all related personal data is deleted within 15 days of such notification.</p> <p>Data subjects have the right to withdraw any consent s/he has given. Withdrawal does not affect the lawfulness of data processing performed prior to such withdrawal.</p>

**2. DATA TRANSFER AND DATA PROCESSORS**

The Data Controller does not transfer personal data to third countries, international organizations, or other recipients. No automated decision-making or profiling is conducted during data processing.

**3. DATA SECURITY MEASURES**

Messages sent to the contact e-mail address, along with personal data provided by the Data Subject, are accessible only to designated employees of the Data Controller (email account managers). These messages are shared exclusively with relevant staff members whose responsibilities include addressing the inquiry.

In the event of a data protection incident, the Data Subject may report it through the contact details provided by the Data Controller.

**4. RIGHTS OF THE DATA SUBJECT**

The Data Subject has the right to request from the Data Controller to be given access to their personal data, to rectify or correct inaccurate data, to erase personal data, to restrict processing, to object to the processing of their personal data, and to exercise the right to data portability. The Data Subject may submit requests related to data processing to the Data Controller by using the contact details provided in this notice.

***Right to access:***

The Data Subject has the right to access their personal data. This is to ensure that the Data Subject is informed and can verify that the Data Controller is processing their personal data in compliance with applicable data protection laws.

***Right to rectification:***

The Data Subject has the right to request the correction of inaccurate or incomplete personal data.

The Data Subject may submit a written request to the Data Controller through the provided contact details for the correction of any personal data (e.g., name or e-mail address if there is a change).

***Right to erasure ('right to be forgotten'):***

The Data Subject has the right to request the deletion or removal of their personal data if there is no legal basis for the Data Controller to continue using such data.

***Right to restriction of processing:***

The Data Subject may request the "blocking" or restriction of the further processing of their data. In the case of restricted processing, the Data Controller may continue to store the data but may not use it for other purposes.

Data restriction may be requested when:

- the Data Subject believes their data is inaccurate,
- the Data Subject believes their data is being processed unlawfully but does not want it to be deleted, or
- the Data Subject requires the data for the establishment or defense of legal claims, but the Data Controller no longer needs the data for its purposes.

***Right to Data Portability:***

The Data Subject has the right to receive their personal data and to transfer this data to another service provider or organization for their own purposes, to be used in connection with other services by such companies. Data portability does not automatically entail the erasure of the data, nor does it affect the Data Controller's retention period for the transferred data.

***Right to Object to Data Processing:***

The Data Subject has the right to object to the processing of personal data due to personal circumstances. The controller shall no longer process the personal data unless the controller 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 scope of exercising rights:***

The Data Controller, without undue delay or within one month of receiving a request at the latest must inform the Data Subject about the measures it has taken in response to the request from the Data Subject concerning his/her intention to exercise his/her rights. In need be, and in view of the complexity of the request and the number of requests, this turnaround time may be extended by a further two month period. The Data Controller will inform the Data Subject about the extension of the deadline, with concurrent indication of the cause of the delay, within one month of receiving the request. Where the Data Controller fails to take any measure at the request of the Data Subject, then - without undue delay or within one month of receiving the request at the latest - the Data Controller will inform the Data Subject about the reasons for not taking any measure, and about the right of the Data Subject to lodge a complaint to a competent supervisory authority, and to seek remedy.

***The right to submit Complaints to supervisory authorities and to resort to court action:***

Complaints regarding data processing can be filed with the National Authority for Data Protection and Freedom of Information (NAIH) (address): H-1055 Budapest, Falk Miksa utca 9-11., mailing

address: 1363 Budapest, Pf.: 9., phone: 06 1 391 1400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

The Data Subject has the right to initiate legal proceedings if they experience unlawful data processing. In such cases, the Data Subject may bring a civil lawsuit against the Data Controller. The case will be adjudged by the regional court. The lawsuit may, at the Data Subject's choice, be filed before the regional court located in their place of residence (a list of regional courts and their contact details is available by clicking on the link below): <http://birosag.hu/torvenyszekek>).

The Data Subject may request compensation for any damage incurred as a result of unlawful data processing (including the failure to implement necessary data security measures) from the Data Controller who is responsible for the damage. If the Data Controller violates the Data Subject's personality rights through unlawful processing of personal data or failure to meet data security requirements, the Data Subject may claim compensation for moral damages (non-material damages) from the Data Controller. The Data Controller may be exempt from liability if it can prove that the damage or violation of the Data Subject's personality rights was caused by an unavoidable external factor that falls outside the scope of the data processing activities. No compensation for damages or moral damages will be provided if the harm was caused by the Data Subject's intentional or grossly negligent conduct.