

Information on data protection for Clients

1. Name of the Data controller

Name of the data controller: Meat Capital Commercial and Service Company Limited
Abbreviated name of the data controller: Meat Capital Ltd.
Company registration number of the data controller: 13 09 166908
Seat of the data controller: 2030 Érd, Sarkcsillag str. 1.
E-contact of the data controller: info@meatcapital.hu
Representative of the data controller: Norbert Orosz managing director

Data protection officer: Angéla Rácz
E-mail address: dataprotection@meatcapital.hu

On behalf of *Meat Capital Ltd.* (hereinafter: The Company or Data controller) we are hereby informing you that in respect of the fulfilment of the service activity your personal data are managed, as follows:

By preparing and making available the present information the Company wishes to ensure implementation of the right of information for the concerned, as determined in article 12 of the GDPR.

The aim of the information is to provide appropriate information for the concerned about the data managed by the Company or processed by the data processor entrusted by it, about their sources, the purpose, the legal basis, the duration of the data management, about the name, address of the possibly involved data processor as well as its activity in respect of data management, and - in case of transferring the personal data of the concerned - about the legal basis and the addressee of the data transfer.

By means of this information the Company wishes to ensure the legal order of the operations of record keeping, enforcement of the constitutional principles of data protection and the requirements of data security, it wishes to prevent unauthorized access to the data as well as their unauthorized change or publication.

Temporal scope of the information is from 25th March, 2018 until withdrawal.

2. The rules of data management

Since information self-determination is the fundamental right of each natural person, fixed in the constitution, so the Company performs data management during its procedures only and solely on the basis of the stipulations of the valid legal rules.

Management of the personal data is only possible for the purpose of exercising the right or for the fulfilment of the obligations. Using of the personal data managed by the Company for private purposes is prohibited. Data management must always observe the principle of purpose limitation.

The Company manages personal data only for the determined purpose, in the interest of exercising the right or fulfilling of the obligations and only to the minimum extent and for the minimum time required for reaching the aim. The purpose must be complied with in each phase of data management, - and if the aim of the data management has ceased or management of the

data is otherwise illegal, then the data will be deleted. Deleting of the data must be implemented by the employee of the Company, actually managing the data. Deleting of the data may be checked by the person actually exercising the employer's right over the employee, or by the data protection officer.

The Company manages personal data with the preliminary - in case of special personal data written - consent of the concerned person or based on the law or statutory authorization.

Prior to taking of the data the Company informs the concerned in each case about the purpose and the legal basis of the data management.

3. Enforcement of the rights of the concerned

The concerned person may ask for information about the management of his personal data, may ask for rectification of his personal data or - with the exception of ordered data management - deletion and limitation via the given contacts of the Company.

The concerned is entitled to receive the personal data put at the disposal of the Data controller and referring to him in widely used, machine readable form and it is also entitled to transfer these data to another data controller.

The Company is obliged to transfer the received application or protest to the leader of the organization with appropriate scope of tasks and power in respect of data management within three days from its arrival.

The head of the organizational unit with the scope of tasks and power must reply to the application of the concerned as to the management of his personal data with 25 days from arrival at the latest - or 15 days in case of exercising the right of protesting - in writing and in an understandable form.

At the request of the concerned the data controller gives information about the following - the data managed, the data processed by him or the data processor appointed by him, about their sources, the purpose, the legal basis, the duration of the data management, about the name, the address of the possibly involved data processor, about the conditions of data protection incident, its effect and the measures taken for their prevention, as well as - in case of transferring the personal data of the concerned - about the legal basis and the addressee of the data transfer.

Provision of the information is free of charge, as a main rule, in case the party asking for the information has not submitted request for the same data sphere in the given year. In other cases, cost compensation may be determined. The measure of the expenses may be fixed in the contract concluded between the parties. The already paid expenses must be refunded if the data were managed illegally, or the request for information led to rectification.

The organizational unit managing the data shall correct the unrealistic data - in case the required data and the confirming public documents are available, - in case the reasons as per article 17 of the GDPR exist, then measures for deleting of the managed personal data must be taken.

The personal data must be deleted if

- a) they are no more required for the purpose they have been collected or otherwise managed;
- b) the concerned withdraws his consent being the basis of the data management and the data management does not have any other legal basis;

- c) the concerned protests against data management and there is no priority reason for the data management or the concerned protests against the data management;
- d) the personal data have been illegally managed;
- e) the personal data must be deleted for the purpose of fulfilling of legal obligations determined by the union or member state rights to be applied for the data controller;
- f) collection of the personal data was performed by offering services for children under 16 and related to offering services regarding the information society;
- g) if the Data controller published the personal data and the personal data are no more required for the purpose they have been collected or otherwise managed, then the data controller must delete them, and with consideration to the available technology and the costs of implementation must do the reasonable steps - including also the technical measures - in order to inform the data managers, that the concerned requested deleting of the personal data links in question and the copy or the duplicate of the personal data.

The concerned may protest against management of his personal data,

- if management or transfer of the personal data is needed exclusively for the fulfilment of legal obligations related to the Data controller or they are required for the enforcement of the legal interests of the Data controller, the data receiver or a third party, except for mandatory data management;
- if the use or transfer of the personal data serves directly the acquisition of business, serves for poll or scientific research; and
- in other cases, determined by the law.

The Data controller must examine the protest within the shortest time, but maximum 15 days, from its submission and take a decision in respect of its soundness and give information about the decision for the applicant in writing.

If the Data controller states soundness of the protest of the concerned - then data management - including collecting of further data and data transfer, too - is stopped, the data will be blocked and will inform about the protest and the measures taken on its basis everyone whom were previously sent the personal data concerned with the protest and who will be obliged to take measures for the enforcement of the protest right.

If the concerned does not agree with the decision of the Data controller, or the Data controller misses the response term, then the concerned is entitled to go to law within 30 days from the announcement of the decision or the last day of the term.

If the data needed for the enforcement of the rights of the data receiver are not received because of the protest of the concerned, then he may go to law against the Data controller within 15 days from announcing the notification in order to get access to the data. The Data controller may also interplead the concerned.

In case the Data manager fails to give notification, then the data receiver may ask for information from the Data controller about the conditions related to the failure of data transfer, and the Data controller must give this information within 8 days from receipt of the relevant application of the data receiver. In case of asking for information the data receiver may go to the law against the Data controller within 15 days from giving the information, or the period open for that at the latest. The Data controller may also interplead the concerned.

The Data controller must not delete the data of the concerned if data management was ordered by the law. However, the data must not be transferred to the data receiver, if the data controller agreed to the protest or the court declared merit of the protest.

In case the judgement of the matter is not clear during exercising of the rights of the concerned, then the head of the organizational unit managing the data may ask for the standpoint of the data protection officer by sending the documents and his standpoint as to the matter, who is to fulfil within 3 days.

The Company is to compensate for the damages caused for others by illegal management of the data or by violation of the requirements of data security as well as the grievance fee in case of breaching the rights of personality caused by him or another data processor employed by him. The Data manager is exempted from the responsibility for the caused damage and payment of the grievance fee if he proves that the damage or the violation of the personality right was the result of unavoidable causes beyond the scope of the data management. The damage will not be compensated if it came from the wilful or seriously careless behaviour of the damaged party.

The concerned may submit legal remedy or claim to the Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet alley 22/c) or the competent court as per his place of residence.

4. Data management realized during the operation of the company

The place of data management:

The seat of the company, in the first place, but data management may be performed at other sites, too, with notification of the concerned.

4.1. Data management related to arrears management

Management of the arrears is performed by own employee of the Company. The Company sends demand for payment for the parties with arrears.

data management registration number: simultaneously with the application of the GDPR the registration of the data management processes by the Hungarian National Authority for Data Protection and Freedom of Information has ceased, it was replaced with the registration obligation of the data manager within his own organization.

the purpose of data management: data management of the parties concerned with arrears

the scope of the managed data: name, address, phone number, e-mail address of the natural person with arrears, in case of a legal entity the name, phone number and e-mail address of the contract person of the company.

legal basis of the data management: enforcement of the legal company interests as per point f) section 81) article 6. of the GDPR.

term of the data storage: payment of the arrears, or limitation of the civil right demands for the arrears (5 years)

the way of data storage: electronic

4.2. Data management related to complaint handling

The concerned are entitled to submit a complaint in respect of the activity of the company. Submission of the complaint may be performed in person, by post, by phone or e-mail.

The oral complaint will be immediately investigated by the Company and it will be remedied, as required. In case the client does not agree with the treatment of the complaint, or its immediate examination is not possible, then a protocol must be drawn up, and a copy given to the guest.

The protocol taken of the complaint includes the following:

- a) the name of the client
- b) the address, the seat or if required the correspondence address of the client;
- c) the place, time and way of submission of the complaint;
- d) the detailed description of the complaint of the clients, stating the objections concerned by the complaint separately, in order to make full investigation of the objections included in the complaint of the client
- e) the list of files, documents and other proofs shown by the client,
- f) the person taking up the protocol and the signature of the client (the latter formal component is needed in case of oral complaint given in persons);
- g) the place and date of drawing up of the protocol.

data management registration number: simultaneously with the application of the GDPR the registration of the data management processes by the Hungarian National Authority for Data Protection and Freedom of Information has ceased, it was replaced with the registration obligation of the data manager within his own organization.

the purpose of data management: taking of the client complaints, arrangement of the complaint related to the service activity

the sphere of the handled data: the name, address/seat, correspondence address, phone number, way of notification of the client, the description, and reason of the complaint, the copy of the documents in the property of the client required for proving the complaint, which are not available for the Company, and the other data needed for the investigation and giving a response to the claim.

Legal basis of the data management: consent as per (1)a of article 6 of the GDPR, and sections (6)-(7) of § 17/A of the act 155 of 1997 about the consumer protection

the deadline of data storage: the Company is obliged to keep the protocol taken of the complaint as well as the copy of the response for 5 years, and to show it to the control authorities at request ((7) § 17/A of the act on customer protection)

the way of data storage: electronic and paper-based

4.3. Data management in respect of the activity

In course of its commercial activity the Company manages the scope of data required for keeping contractual contact in the customer relation system and in respect of the management of the clients' contracts.

Management of the personal data will be performed in the scope of the own sphere of activities during the commercial activities - mainly through the contracting company partners - and for the identification of a low number of data management processes.

The regulations referring to the management of the employees participating in the fulfilment of the activity, will be detailed in point - data management of the staff.

Sphere of commercial services: The service is performed almost exclusively by the fulfilment of the contracts of the company partners, in respect of the private persons only the personal data suitable for identification of the contracting activity are managed in respect of the implementation tasks and forwarding.

In course of the conclusion and fulfilment of the contracts the personal data of the employees, company representatives, participants and contact persons, as natural persons, will be given and recorded. The personal data put at the disposal of the Company in respect of the contract are only stored for the purpose of good commerce, goods delivery and other services in the scope of activity of the company.

data management registration number: simultaneously with the application of the GDPR the registration of the data management processes by the Hungarian National Authority for Data Protection and Freedom of Information has ceased, it was replaced with the registration obligation of the data manager within his own organization.

the aim of data management: identification of the person required during fulfilment of the contracts, checking of the instructions and the power of disposal of the identified persons

the scope of the managed data: contractual partners, the name and contacts of the designated entitled and the personal data suitable for identification

legal basis of the data management: fulfilment of the contractual obligations as per point b) of section (6) article 6. of the GDPR and the enforcement of the rightful company interests as per point f) section (1) article 6 of the GDPR.

the deadline of data storage: 7 closed business years following termination of the service contract

the way of data storage: electronic and paper-based

5. Issues not regulated by the present information

In respect of the issues not regulated by the present information the order 2016/679 of the European Parliament and of the Council (EU) are decisive.