

Privacy Notice

Notice of changes to the Privacy Notice: We updated our Privacy Policy on 11 November, 2019 to include additional clarity regarding the personal data we process about customers, other individuals and business partners who express an interest in our products or services.

This privacy notice applies to all personal data you provide to us and to all personal data which we collect on you, either about how you use our website (using "cookies") or provided for us.

1. Who we are and how to contact us

Tungsrám Operations Kft. (“**Tungsrám**”, “**we**” or “**us**”) acts as a data controller. It means Tungsrám decides how your personal data is processed and for what purposes.

Name: Tungsrám Operations Kft.
Seat: 1044 Budapest, Váci street 77. Hungary
Corporate ID: HUOCCSZ01-09-320120
Tax ID: HU26250061

Name of the : Brázda Péter
Email: adatvedelem@tungsrám.com

If you have any questions or concerns regarding our privacy notice, please send a detailed message to the address listed above.

2. Why do we collect personal data

We ask our customers and business partners to share personal data with us for the following purposes:

- (a) Buying products and services from Tungsrám Operations Ltd: to **process your order and deliver the services or products** you have purchased from us as a private individual, or as a legal entity consumer, we collect the following personal data : name, address, phone number, e-mail address, credit or bank card details; as well as in case of a legal entity consumer contact name, e-mail address and phone number of the appointed contact persons and, or representatives: name, email address, telephone number;
- (b) Receiving information about Tungsrám products and services to **resolve questions or complaints** made by you in relation to products or services, or this purpose we collect the following data: name, address, phone number, e-mail address;
- (c) to **send information** (including newsletters) to customers (qualifying consumers) about Tungsrám products, services and offers, for this purpose we collect the following data: name, address, phone number, e-mail address;
- (d) to **send information** (including newsletters) to our business partners about Tungsrám products, services and offers, for this purpose we collect the following data: name, address, phone number, e-mail address;

- (e) to **participate in Tungstram online communities**, including our social media channels/pages and blogs, for this purpose we collect the following data: name, address, phone number, e-mail address,
- (f) to **help us to develop products and services** which are in line with your needs and preferences, for this purpose we collect the following data: name, e-mail address
- (g) to **send you invitations** for Tungstram's events, for this purpose we collect the following data: name, phone number, e-mail address.

We process personal data only for those purposes that we have communicated.

Further processing of personal data

If we wish to use your personal data for a new purpose, not covered by this privacy notice, we will provide you with a new notice explaining all conditions relating to the new processing prior to the new processing takes place. If required, we will seek your consent before commencing the new data processing activity.

3. Legal basis of data processing

The legal basis of data processing activities indicated in point a) of Section 2 of this Privacy Notice lies in Article 6 (1) (b) of the General Data Protection Regulation (Regulation No. 2016/679 of the European Parliament and of the Council) ("**GDPR**"), i.e. such processing activities are necessary for the performance of contract or in order to take steps at the request of data subject to entering into a contract.

The legal basis of data processing activities indicated in point b), c), d), e), f) and g) of Section 2 of this Privacy Notice lies in Article 6 (1) (a) of the GDPR, i.e. such processing activities will be based on your consent.

4. Data collection

4.1. Existing data

Our sales organization have collected personal data during normal business cooperation, during regular day to day work, visiting and meeting existing business partners.

4.2. New data

Our employees in the sales or marketing organization regularly collect new contact names, mostly from the following sources:

- Names within existing customer, for example store manager name, other staff in outlets.
- New potential customer contact found on-line locations like websites, social media accounts (LinkedIn, Facebook).
- Meeting people on events, fairs, conferences

In these cases, we collect the following data:

- name,
- position in company,
- telephone number,
- email address.
- Business address
- Name and address of the company the person works for

- IP address
- [personal details that may come up in the scope of the business relationship, e.g. your hobbies, age)

Ways we collect private data:

- Sharing business cards;
- Face to face meetings on events, trade shows, customer meetings;
- From data publicly available on web-sites, social media accounts;
- Via recommendation from other business partners or other sources;
- Your communications with Tungsram. These can be product- or service-related, and may include the contents of your questions to us, or requests that you addressed to us;
- Communicating with one of our Tungsram Customer Care representatives by email, phone or in writing;
- Ordering a product or service;
- Participating in a promotion, game or competition;
- Participating in a social media activity related to a promotion, e.g. clicking "like" or "share";
- Asking to receive messages on your mobile phone/device;
- Subscribing to a Tungsram newsletter;
- Social Listening: Tungsram may search the Internet for relevant and publicly available content and use it to improve its products or services, resolve consumer issues and provide targeted marketing.

4.3. Data Storage

Private data are stored on the following locations:

- Central data storage (BOX)

When visiting a website, our system automatically records (using cookies) the IP address of the affected computer, the start date of the visit, and, in some cases, the type of browser and operating system, depending on the configuration of the computer, and the IP address geographic location. The data recorded in this way cannot be linked to other personal data. Data management is for statistical purposes only.

For more information on how to automatically record data (cookie), see Tungsram cookies policy:

<https://tungsram.com/api/v1/companies/15/files/185232/view>

5. How long do we keep your personal data?

We process your personal data for the time required consistent with the purposes set out in this Privacy Notice or for the period of limitation prescribed in the relevant laws.

We keep your personal data for no longer than reasonably necessary: for a period of 5, or in certain cases 8 years from the fulfillment of the contract concluded with us in order to comply with applicable data retention laws.

In case of accounting documents, the retention period is 8 years from the closing of the financial year, in accordance with Section 169 of Act C of 2000 on Accounting.

If a court or disciplinary procedure is initiated, then the personal data will be retained until the termination of the proceedings, including the duration of any possible remedy, which data thereafter, in the case of civil claims, will be deleted after the civil law statute of limitation runs.

In the case of consent-based data processing, personal data will be processed until the consent is withdrawn.

6. Data security

In the context of the management of your personal data, Tungfram will ensure the security of the data and will take all the necessary technical and organizational measures and establish the procedural rules necessary to enforce the requirements of the relevant legislation.

Accordingly, the data is protected by appropriate measures, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, and unavailability due to accidental destruction and damage to the technique used.

7. How we protect personal data

We recognize and take seriously our responsibility to protect any personal data from loss, misuse or unauthorized access. Tungfram uses a variety of security technologies and organizational procedures to help protect your personal data. For example, we implement access controls, use firewalls and secure servers, and we encrypt certain types of data, such as financial information and other sensitive data.

8. Your personal data protection rights

Pursuant to the applicable data protection law you may have the right

1. to request access to your personal data,
2. to request rectification of your personal data,
3. to request erasure of your personal data,
4. to request restriction of processing of your personal data,
5. to request data portability,
6. to object to the processing of your personal data (including objection to profiling; also other rights in connection with automated decision-making),
7. to withdraw your consent.

8.1. Right to access

You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed and where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- (d) where possible, the envisaged period for which the personal data will be stored or if not possible, the criteria used to determine that period;

- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (f) the right to lodge a complaint with NAIH;
- (g) the right to seek judicial remedies;
- (h) where the personal data are not collected from the data subject, any available information as to their source;
- (i) the existence of automated decision-making, including profiling and at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- (j) appropriate measures taken in case of data transfer to third countries or international organizations

You may have the right to obtain a copy of the personal data undergoing processing. We may request additional information from you for identification or for further copies requested by you, we may charge a reasonable fee based on administrative costs.

8.2. Right to rectification

You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

8.3. Right to erasure (right to be forgotten)

You may have the right to request from us the erasure of your personal data and we are be obliged to erase such personal data. In such cases we will not be able to further provide you with our services. You may have the right to request if one of the following grounds applies:

- (a) The personal data is no longer necessary for the purpose we collected it for.
- (b) You withdrew your consent to our processing activities and no other legal basis for processing applies.
- (c) You objected to:
- (d) processing that is necessary for us to perform a task in the public interest or in the exercise of our official authority; and
- (e) there are no overriding legitimate grounds to process the personal data.
- (f) You objected under to:
 - a. processing that is necessary to pursue our or a third party's legitimate interests; and
 - b. there are no overriding legitimate grounds to process the personal data.
- (g) You objected to processing for direct marketing purposes.
- (h) We unlawfully processed the personal data.
- (i) EU or member state law requires us to erase your personal data to comply with a legal obligation.
- (j) We collected the personal data in the context of offering online services to children.

8.4. Right to restrict processing

You may have the right to request from us the restriction of processing your personal data if one of the following grounds applies:

- (a) You contest the accuracy of the personal data we process about you. We must restrict processing the contested data until we can verify the accuracy of your personal data.

- (b) We are unlawfully processing your personal data.
- (c) We no longer need to process your personal data but you need the personal data for the establishment, exercise or defense of legal claims.
- (d) You are objecting for processing that we:
 - a. consider necessary to perform a task in the public interest; or
 - b. consider necessary for Tunggram's or a third party's legitimate interests.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If processing of your personal data has been restricted, you will be informed before the restriction of processing is lifted.

8.5. Right to object and rights relating to automated decision-making

You shall have the right to object, on grounds relating to your particular situation, at any time to processing your personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Tunggram or which is based on purposes of the legitimate interests pursued by Tunggram or by a third party, including profiling based on those provisions. Tunggram shall no longer process the personal data unless Tunggram demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. When you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes you, on grounds relating to your particular situation, shall have the right to object to processing of your personal data, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8.6. Right to data portability

You shall have the right to receive the personal data concerning you, which you provided to Tunggram, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where:

- (a) the processing is based on your consent or the processing is necessary for us to perform a contract with you; and
- (b) the processing is carried out by automated means.

You shall have the right to have your personal data transmitted directly from us to another controller, where technically feasible.

The exercise of the right to data portability shall be without prejudice to right to erasure referred to under section 6.3]. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right to data portability shall not adversely affect the rights and freedoms of others.

8.7. Right to withdraw consent

When the processing of your personal data is based on your consent, you can withdraw your consent at any time without giving any reason to us. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Tungram ensures that you are able to withdraw your consent as easy as it was given.

You can opt-out of receiving certain promotional or marketing communications from us at any time, by using the unsubscribe link in the emails communications we send, or by sending us a message to our addresses indicated in point 1.

If you are our business partner or customer we will still send you non-promotional communications, like service related emails.

9. Legal remedies

9.1. Lodge a complaint with the competent data protection authority

If you feel that the processing of your personal data have breached the provisions of GDPR, you are entitled to lodge a complaint with the Hungarian Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság; “**NAIH**”, H-1125, Hungary, Budapest, Szilágyi Erzsébet fasor 22/C.; telephone: +36-1 391-1400; telefax: +36-1 391-1410; e-mail: ugyfelszol-galat@naih.hu).

9.2. Judicial remedy

If NAIH fails to address your complaint or does not inform you on the actions taken or results of the proceedings initiated on your complaint or otherwise you believe that the processing of your personal data breaches the provisions of GDPR you are entitled to seek judicial remedies.

Judicial proceedings against

- (a) NAIH shall be initiated before Budapest-Capital Regional Court or before the competent regional court according to your habitual place of residence.
- (b) Tungram - in the event of the breach of your rights under GDPR - before Budapest-Capital Regional Court or before the competent regional court according to your habitual place of residence.

10. Sharing personal data

Tungsrām, in the course of its operation, may utilize the services of various data processors and external service providers to handle and process your personal data for specific purposes, on behalf of and in accordance with the instructions of Tungsrām. In addition, under the applicable laws Tungsrām is required to share your personal data with governmental bodies, authorities and other enforcement bodies.

The data processors shall process the personal data as long as the term of the data processing contract concluded with them is valid and in force, or until they are required to keep your data under the applicable data retention laws.

We may disclose your personal data to the following categories of third parties (recipients) for the purposes described below:

- (a) service providers, distributors and other third parties who you order products or other services through;
- (b) third party distributors, service providers whose services you purchased on our website;
- (c) our partners in loyalty schemes that you have joined;
- (d) third parties running customer surveys on our behalf;
- (e) other third-party service providers involved by us for data processing (e.g. companies performing postal services for us or web-developers, cloud service providers);
- (f) third parties, such as law firms, courts, other bodies or service providers in order to enforce or apply any contract with you;
- (g) government authorities or enforcement bodies such as the police and regulatory authorities, upon their request and only as required by the applicable law or to protect our rights or the safety of our customers, staff and assets.

Our <http://ilexmarketplace.tungsrām.com/> website is hosted by an official service provider. The Service Provider has administrative access to the Site, in the manner specified in the contract with Tungsrām, with respect to the data stored by or on the Site. The supplier is liable for confidentiality in providing the service.

11. Changes to this privacy notice

The services that Tungsrām provides are always evolving and the form and nature of the services that we provide may change from time to time. For this reason, we reserve the right to change or add to this Privacy Notice from time to time. If any change in this Privacy Policy occurs, we will publish the updated version on our website <https://tungsrām.com/> and in case of material changes we will send you an email (if you have registered your email details with us). You are responsible for periodically reviewing this Privacy Notice.

The privacy notice is effective from 31 August, 2018.

If you have any questions, comments or concerns about how we handle your personal data, then you may contact us per e-mail: adatvedelem@tungsrām.com