

PRIVACY POLICY

of

**HLB Magyarország Könyvvizsgáló és Tanácsadó
Korlátolt Felelősségű Társaság**

(hereinafter: Privacy Policy)

Effective as of 14 August 2023

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1. Data Controller

Data Controller	HLB Magyarország Könyvvizsgáló és Tanácsadó Korlátolt Felelősségű Társaság (seat: 1143 Budapest, Stefánia út 101-103.; registration number: Cg.01-09-683898; hereinafter: Data Controller)	
Representatives of the Data Controller and their contact details	Lambert Zoltán managing director e-mail adress: zoltan.lambert@hلبh.hu	
	Szeles Szabolcs managing director e-mail adress: szabolcs.szeles@hلبh.hu	
	Mihály Ádám managing director email address: adam.mihaly@hلبh.hu	
	Baldauf Csaba email address: csaba.baldauf@hلبh.hu	
Email address of the Data Controller	email:	hلب@hلبh.hu
Webpage	https://www.hلبh.hu/ (hereinafter: Webpage)	
Social media	Facebook	https://www.facebook.com/wtsklient/HLBMagyarország
	LinkedIn	https://www.linkedin.com/company/wtshlb-hungary/
	XING	https://www.xing.com/xbp/pages/hلب-ungarn

2. Definitions

For the purposes of this Privacy Policy:

- 2.1. *data subject* means the natural person identified or identifiable on the basis of his / her personal data, including but not limited to the natural person who contacts the Data Controller via post, telephone, via email by sending an email to the hلب@hلبh.hu email address, by giving its personal data on the Webpage or a social media platform for the purpose of requesting information and/or a proposal;
- 2.2. *personal data* means any information relating to an identified or identifiable data subject. An identifiable natural person is one who can be identified, directly or indirectly, in particular by an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 2.3. *Data Controller*: Please see Section 1 of this Privacy Policy.
- 2.4. *data processing* means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- 2.5. *data processor* means a natural or legal person, which processes personal data on behalf of the Data Controller.
- 2.6. *consent* of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the controlling of personal data relating to him or her;
- 2.7. *Authority* means the National Authority for Data Protection and Freedom of Information (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság).

3. Data controlling practice of the Data Controller

The Data Controller is committed to the protection of personal data of the data subjects and respects their right to informational self-determination.

In order to secure the rightful, fair and transparent controlling of the personal data of data subjects, the Data Controller presents in detail its data controlling practice in this Privacy Policy concerning the data controlling activities specified in this Privacy Policy. Regarding the data controlling activities that are not presented in the Privacy Policy, the Data Controller provides further information when recording the data.

The Data Controller declares that his data controlling practice has been formed based especially on the following laws:

- 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 (hereinafter: GDPR);
- Hungarian Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The Data Controller emphasizes that its data controlling practice corresponds to the legislation in force and complies with the best practices of the Authority. With respect thereof, the Data Controller reviews its data controlling practice regularly.

The privacy policy in force can be found under the following link <https://hlbh.hu/> and the printed version thereof can be found in 1143 Budapest, Stefánia út 101-103.

4. Principles

The Data Controller complies with the following principles during his data controlling practice:

Principle	Fulfilment of the principle in the controlling practice of the Data Controller
Lawfulness, right to a fair trial and transparency	The Data Controller acts in compliance with the legislation in force and respects the right of data subjects to protection of personal data and to informational self-determination. The Data Controller prepares perspicuous, easy-to-read privacy policy in a table form for each controlling activity. In the preparation of the Privacy Policy, the Data Controller applies Q&A format. The Data Controller ensures that the

	privacy policy in effect is accessible for data subjects in electronic and in printed form.
Purpose limitation	The Data Controller determines precisely the purpose of the data controlling for each data controlling activity and the purpose of data controlling with regard to the different data categories. The Data Controller is not entitled to use the personal data for a different purpose.
Data minimisation	The Data Controller endeavours to process exclusively the personal data that are required for the performance of the purposes defined for each data controlling activity.
Accuracy	The Data Controller reviews the processed data regularly and, in case of inaccuracy, it rectifies or erases them.
Storage limitation	The Data Controller defines the term of the data controlling for each data controlling activity. The Data Controller stores the personal data as long as it is necessary for the purposes of which the personal data are processed.
Integrity and confidentiality	The Data Controller endeavours to ensure the appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage of data, by using appropriate technical and/or organisational measures.
Accountability	The Data Controller shall be responsible for, and be able to demonstrate compliance with, the present principles. For the sake of this goal the Data Controller intends to document its data controlling practice in as much detail as possible.

5. Rights of data subjects and exercise of rights

5.1. Rights of data subjects

What are the rights of the data subjects?	<p>According to Sections 12-22 of the GDPR, the data subject has the following rights concerning the data controlling activity contained in this Privacy Policy. The data subject can:</p> <ul style="list-style-type: none"> - ask for information concerning the controlling of his/her personal data (<i>right to be informed</i>) - in certain cases, the data subject may exercise the right to data portability (<i>right to data portability</i>) - ask for rectification of the data in case it is incorrect, inaccurate or incomplete (<i>right to rectification</i>) - ask for the deletion of his/her personal data in case they are no longer necessary or the controlling is unlawful (<i>right to erasure</i>)
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- in certain cases, ask for the restriction of the data controlling (*right to restriction of data processing/ to blocking*)

Rights of information (right to access)

The data subject shall have the right to know whether personal data are stored concerning him or her by the Data Controller and has the right to obtain the following information:

- the categories, the legal basis, the purpose and the duration of data controlling;
- circle of person that can have access to the data of the data subject and the circumstances, legal basis for such data transmissions;
- source of personal data;
- if the Data Controller uses automatized decision and the process and logic of it, including profile creation;
- the fact of data protection incident, its circumstances, influence and the steps for remedying it;
- the rights and the exercise of rights of data subjects concerning the data controlling.

Right to data portability

In case the data controlling is based on consent or contract and the data controlling is carried out in an automated way (i.e. in a non-paper form) the data subject shall have the right to

- (i) receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format (for example in a .doc, .pdf format) and
- (ii) to transmit those data to another controller without hindrance from the Data Controller.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to rectification

In case the data subject believes that the personal data concerning him / her are inaccurate, erroneous or incomplete, the data subject shall have the right to request the Data Controller the rectification or the completion of the concerned data.

Right to erasure (right to be forgotten)

The data subject shall have the right that upon his / her request the Data Controller erases the personal data concerning him / her in the following cases:

- further processing is not required for the purposes set out in this Privacy Policy;

- the purpose of data controlling set out in this Privacy Policy no longer exists or the duration of the data controlling period stipulated by law expired;
- if the data subject withdraws his/her consent to the data controlling and a prior legal basis for processing no longer exists;
- the Data Controller processed the personal data unlawfully;
- if it is ordered by court or the Authority;
- the erasure of data is needed for the fulfilment of requirements ordered by law of the member state or the European Union.

Where the Data Controller has made the personal data public and is obliged to erase the personal data in accordance with the above, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are controlling the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data (for example erasure from among search results of browsers).

The Data Controller draws the data subject's attention to that personal data cannot be deleted especially if needed for the submission of legal claims the or protection thereof.

Right to restriction of data controlling (right to block)

The data subject shall have the right to obtain from the Data Controller restriction of data controlling where one of the following applies:

- the accuracy of the personal data is contested by the data subject (in which case the restriction is for a period enabling the Data Controller to verify the accuracy of the personal data);
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the data controlling, but the data is required for the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing (in which case the restriction is for the period pending the verification whether the legitimate grounds of the controller override those of the data subject).

Where data controlling has been restricted, such personal data may - with the exception of storage - be processed only with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

The data subject who has obtained restriction of data controlling shall be informed by the Data Controller before the restriction of data controlling is lifted.

5.2. Exercise of rights

How can the data subject exercise his / her rights?	<p>The data subject can exercise his or her rights according to the following:</p> <ul style="list-style-type: none">- in writing, by sending it electronically to the following email address: szabolcs.szeles@hlbh.hu- in writing, by post to the following address: 1143 Budapest, Stefánia út 101-103. (addressed to Szabolcs Szeles managing director)- in person, verbally at 1143 Budapest, Stefánia út 101-103 on weekdays from 12 midday to 2 p.m.
Within how many days is the Data Controller obliged to make the necessary measures?	<p>The Data Controller shall take the necessary measures without delay, but latest within 15 days from the receipt/delivery of the claim.</p>
In which form are the data subjects informed by the Data Controller?	<ul style="list-style-type: none">- in case of a written request sent by email, the Data Controller informs the data subject via email, unless it is expressly requested by the data subject otherwise;- in case of a written request sent by post, the Data Controller informs the data subject in a letter sent by post, unless it is expressly requested by the data subject otherwise;- in case of a request submitted in person or by phone, the Data Controller informs the data subject via email or in a letter sent by post to the address or email address given by the data subject
What kind of measures are taken by the Data Controller?	<p>The Data Controller</p> <ul style="list-style-type: none">- gives information,- rectifies / erases / restricts (blocks) the data, or- makes other measures <p>in accordance with the request of the data subject, if no ground for exclusion exists.</p> <p>Besides the data subjects, the Data Controller informs the persons to whom previously the data was transferred or given for the purpose of processing, of the rectification, erasure, blocking of data controlling. Upon request of the data subject, the Data Controller informs him / her about these addressees. The Data Controller dismisses this information requirement, if it does not harm the legitimate interest of the data subject with regard the purpose of the data controlling.</p>
What happens, if rights cannot be exercised?	<p>The latest within 15 days from the delivery/receipt of the claim, the Data Controller shall inform the data subject in</p>

writing also if the data subject cannot exercise his/her rights for any reason.

The Data Controller shall designate

- the legal and factual reason why the rights cannot be exercised, and
- the remedies available for the data subject (judicial remedy, lodging a complaint with the Authority).

Where can the data subject seek remedies?

In case the data subject does not agree with the Data Controller's response or measures upon his or her request, then the following remedies are at the disposal of the data subject

1. Judicial remedy

In case of any violation of the data subject's rights, he or she may seek judicial remedy. The action shall fall within the competence of the tribunal according to his/her home address or his/her residence, depending on his or her choice.

2. Complaint with the Authority

The data subject may lodge a complaint with the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)

Address: 1055 Budapest,
Falk Miksa utca 9-11.
telephone: +36 (1) 391-1400
telefax: +36 (1) 391-1410
web page: <http://www.naih.hu>
email address: ugyfelszolgalat@naih.hu

6. Activities affected by data controlling

6.1. Request for information/giving information, request for proposal giving proposal

Who is the data subject?

Data subject is the private individual, who contact the Data Controller via phone/email/post/Webpage or in person in order to ask for information or proposal in relation to the services offered by the data controller by giving his or her personal data.

Scope of processed data and purpose of data controlling

The purpose of data controlling is the giving information/proposal, contact, preparatory steps for contracts, contract preparation. If the data subject does not accept the proposal, the further purpose of the data controlling is direct marketing.

Processed data

name	identification
email address (optional)	contact
telephone number (optional)	contact
company name	identification, contact, giving information/proposal
city/town country	giving information/proposal
level of contact	identification/contact
content of the requested information/proposal	giving information/proposal
date of the requested information/proposal	giving information/proposal
content of the information/proposal	giving information/proposal

What is the source of the data?

The applicant (data subject) provides the data at the disposal of the Data Controller himself / herself.

Who is entitled to process the data?

The data may be known and be processed by the Data Controller and those employees / assignees of the data processors whose scope of job / whose task includes the fulfilment of the data controlling purpose(s). The data are controlled in electronic and printed form.

Which is the legal basis of data controlling (lawfulness of processing)?

The legal basis of data controlling is the consent of the data subject (Section 6 (1) a) of the GDPR). Concerning the request or provision of a proposal, the data controlling is necessary for taking steps at the request of the data subject prior to entering into a contract and for the conclusion / performance of the agreement (Section 6 (1) b) of the GDPR).

Can the applicant (data subject) withdraw its consent to data controlling?

The Data Controller informs the applicant (data subject), that he / she can withdraw his / her consent to data controlling anytime. The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

What is the period of data controlling?

The Data Controller controls the data:

- i. in case of request or provision of information, until erasure upon request, but for 2 years as of the response, the most;
- ii. in case of request or provision of a proposal, if the proposal is accepted, until the statute of limitation of the assertability of the rights and obligations arising from such legal relationship;
- iii. in case of request or provision of a proposal, if the proposal is not accepted, for 2 years as of the provision of proposal, the most, unless the data subject indicates in advance that the Data Controller no longer processes the data for direct marketing purposes.

Joint Data Controlling

The Data Controller and WTS Klient Gazdasági Tanácsadó Korlátolt Felelősségű Társaság (seat: 1143 Budapest, Stefánia út 101-103; registration number: Cg.01-09-730729), regarding the contact information (name, position, e-mail address, phone number, name of the company), decide jointly the purpose and the tools for data controlling and as a result they are considered joint Data Controllers and their liability is joint and several.

Data Processor	WTS Klient Gazdasági Tanácsadó Korlátolt Felelősségű Társaság (seat: 1143 Budapest, Stefánia út 101-103.; registration number: Cg.01-09-730729) – securing server, system administrator tasks, partnership management (CRM)
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6.2. *Presence of Social media platforms (Facebook, LinkedIn, XING)*

Who is the data subject?	Data subject is a private individual who uses the media platforms, follows, shares or likes the contents of the Data Controller or who contacts the Data Controller through it, or uses the media platform for any other allowed activities.
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What is the purpose of data controlling?	The purpose of data controlling is to share the information found on the Webpage on social media platforms. The Data Controller only gets in touch with the data subjects through the media platforms, and the circle of the controlled data becomes important if the data subject contacts the Data Controller through the social media platforms.
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Scope of processed data and purpose of data controlling	public name	identification
	public photo (not stored by the Data Controller)	identification
	message and response through social media platform	response
	rating	quality improvement

What is the source of the data?	The data subject himself / herself provides it for the Data Controller.
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Who is entitled to process the data?	The data may be known and be processed by the Data Controller and those employees/assignees of the data processors whose scope of job / whose tasks includes the fulfilment of the data controlling purposes. The data is controlled in an electronic way.
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Which is the legal basis of data	The legal basis of data controlling is the consent of the data subject [Section 6 (1) a) of the GDPR].
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**controlling
(lawfulness of
processing)?**

**What is the period of
data controlling?**

Until the response or prior to that until erasure upon request. In case the data subject asks for information or proposal, the data controlling process is written in a detailed version in the 6.1 section of the Privacy Policy.

**Can the data subject
withdraw its consent
to data controlling?**

The Data Controller informs the data subject that he / she can withdraw his / her consent to data controlling anytime (please see the description of the process). The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Data Processor

WTS Klient Gazdasági Tanácsadó Korlátolt Felelősségű Társaság (seat: 1143 Budapest, Stefánia road 101-103.; registration number: Cg.01-09-730729) – content provision to the webpage: <https://www.hlbh.hu>, management of the social media pages of the Data Controller, system administrator, e-mail services

Built in modules

LinkedIn plugin
A LinkedIn services are provided by the LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2) The description of the LinkedIn built-in module can be found on the following link: <https://developer.linkedin.com/plugins>. The LinkedIn Privacy Policy can be found on the following link: <https://www.linkedin.com/legal/privacy-policy>

Facebook plugin
The Facebook services are provided by Meta Platforms Ireland Ltd. (4 Grand Canal Square Grand Canal Harbour, Dublin 2) on the following address: <https://www.facebook.com/>. The description of the Facebook built-in module can be found on the following link: <http://developers.facebook.com/plugins>. The Facebook Privacy Policy can be found on the following link: <http://www.facebook.com/privacy.php>

XING plugin
The XING services are provided by New Work SE (Am Strandkai 1, 20457 Hamburg) on the following address: <https://www.xing.com/>. The description of XING built-in module can be found on the following link: https://dev.xing.com/plugins/terms_and_conditions. The XING Privacy Policy can be found on the following link: <https://privacy.xing.com/en/privacy-policy>.

7. Data transfers

Personal data is primarily processed by the Data Controller, or, in case of outsourcing such activity, it is carried out by data processors listed in this Privacy Policy. In that case the Data Controller provides data to the Data Processors and the Data Controller is liable for his / her / their activities.

The Data Controller may forward personal data in case of a request by an authority based on provisions of law.

8. Data Controlling concerning the webpage

The technical conditions of the Webpage are provided by HLB International Limited (seat: Lynton House 7-12, Tavistock Square, London, United Kingdom, WC1H 9LT).

During the use of the Webpage, cookies may be placed in the browser (e.g. Firefox, Google Chrome) of the suitable devices. By clicking on the „Agree” button, the data subject (user) agrees that cookies will be used by the Webpage. [Section 6 (1) a) of the GDPR]. The data subject can withdraw his or her consent anytime.

(i) *What does the expression „cookies” mean?*

The cookies are pack of information placed in the browser of the suitable devices by the server of the Data Controller or by the service provider of the Data Controller. When the data subject (user) visits the concerned webpage again, the browser visualize the webpage according to the cookies.

(ii) *What purposes can the cookies be used for?*

The purpose of using cookies can be different. The use of cookies can be a technical requirement but it can also help a webpage to be user friendly.

(iii) *How can the cookies be regulated?*

The data subject (user) can manage the settings of the cookies in the browser, in the frame of which the data subject can limit or deny the use of cookies. Concerning the deletion or prohibition of the cookies, the use of „help” menu of the respective browser can provide further information.

Google Chrome	https://support.google.com/chrome/answer/95647?hl=hu
Firefox	https://support.mozilla.org/hu/kb/weboldalal-elteljesitese-szamito
Safari	https://support.apple.com/hu-hu/guide/safari/sfri11471/mac
Explorer	https://support.microsoft.com/hu-hu/help/278835/how-to-delete-cookie-files-in-internet-explorer

(iv) *The cookies named by the webpage*

Name	Domain	Function	Validity
_gat_UA-126772229-1	hlbh.hu	It serves for providing data for the Google Analytics anonym	end of session

		measurement of the number of visitors	
_gat	h1bh.hu	It serves for providing data for the Google Analytics anonym measurement of the number of visitors	end of session
_ga	h1bh.hu	It serves for providing data for the Google Analytics anonym measurement of the number of visitors	2 years
_gid	h1bh.hu	It serves for providing data for the Google Analytics anonym measurement of the number of visitors	end of session
PHPSESSID	h1bh.hu	for the operation of the webpage	end of session
viewed_cookie_policy	h1bh.hu	decision of the data subject (user) regarding the cookies	12 months

The server of the Data Controller or the service provider engaged by the Data Controller is using Google Analytics, which might place cookies in the browser of suitable devices. By using the Google Analytics for statistical purposes, the Data Controller collects data concerning the visiting of the webpage. The Google Analytics records data like the length of time spent on the Webpage by the data subject (user), or the way the data subject (user) reached the Webpage. The IP address and the type of the browser also belongs to the group of the collected data. Data which leads to the identification of the data subject are not collected.

The provider for users in the European Economic Area or in Switzerland is Google Ireland Limited (registered seat: Gordon House, Barrow Street, Dublin 4, Ireland), for users in the United Kingdom is Google LLC (registered seat: 1600 Amphitheatre Parkway, Mountain View, California 94043, USA). The privacy policy of the Google Analytics can be found on the following link: <https://support.google.com/analytics/answer/6004245?hl=hu>

The data subject (user) can install an add-on module in his or her browser, which denies access of Google Analytics concerning the data subject's (user's) data. For this operation the following link can be used: tools.google.com/dlpage/gaoptout.

9. Data security

The Data Controller ensures the security of the data; therefore, the Data Controller implements appropriate technical and organisational measures (for example: pseudonymisation and encryption; assurance of the ongoing confidentiality, integrity, availability and resilience of processing systems and service measures; testing, assessment and evaluation of the processing system) in order to ensure a level of security appropriate to the risk. Furthermore, the Data Controller intends to take into consideration the actual state of technical development when defining and implementing the technical and organisational measures. The Data Controller guarantees the fulfilment of data security by internal policies, orders and procedures.

With respect to security of information technology, the Data Controller ensures especially:

- measures against the unauthorized access to personal data, including the physical and logical protection of the software and hardware tools and devices;
- measures for possibility of recovering the data, including regular backups and separate handling of backups;
- anti-virus protection of the data.

This Privacy Policy has been prepared in Hungarian and in English languages. In case of any discrepancies between the Hungarian and the English text, the Hungarian version shall prevail.