

Information on data protection

1. The data controller and their contact details

This prospectus contains information from the law firm Viktor Áron Dávid (registered office: 1034 Budapest, Viador utca 11., tax number: 19164261-2-41, Tel: www.vikorlaw.com) (hereinafter referred to as "Law Firm") regarding the processing of personal data of current, former and potential clients and related persons (hereinafter collectively referred to as "Client" or "Clients").

The purpose of this notice is to set out the principles of data protection and data management, as well as the OWNER's data protection and data management policy.

Article 37 of the GDPR states that the customs office is not obliged to appoint a data protection officer in accordance with Article 3(1).

2. the scope of the legal provisions on which the processing is based

- for the prevention and combating of money laundering and terrorist financing 2017. LIII. Act ("Pmt."),
- 2017 on the implementation of the restrictive financial and property measures imposed by the European Union and the United Nations Security Council LII Law,
- the 2017 Act on the Practice of Lawyers. LXXVIII. Act ("Act"),
- on the right to informational self-determination and freedom of information of 2011. CXII Act ("Infotv."),
- Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC ("GDPR").

3. the principles of data management

The property management agency is committed to ensuring that all data processing related to its activities complies with the requirements of this notice, the General Data Protection Regulation (GDPR), and applicable national legislation. The client office will take all necessary measures to protect the personal data of its clients and the personal data they provide, as well as the rights of data subjects. The client office treats personal data confidentially and implements all necessary security-related technical and organizational measures to guarantee data security.

Within the framework of the above, the OWNER shall take appropriate measures to ensure that personal data of customers is protected at all times.

- in a lawful and fair manner and on an appropriate legal basis (legality, fairness and transparency);
- to use them only for specified, explicit and legitimate purposes and not to process them in a manner incompatible with those purposes;
- are adequate, relevant and limited to what is necessary for the purposes for which the data are processed (data minimization);
- be correct and, where necessary, updated; inaccurate personal data should be deleted or corrected as soon as possible (accuracy);
- store personal data in a form that permits identification of customers only for as long as is necessary to achieve the purposes for which the personal data are processed; personal data should only be stored for longer periods for statistical purposes, provided that appropriate technical and organizational measures are taken (limited storage);
- processed in such a way as to ensure appropriate security of the personal data, including protection against unauthorized or unlawful processing, accidental loss, accidental destruction or accidental damage (integrity and confidentiality), through appropriate technical or organisational measures.

At the same time, customers are obliged to ensure that the data subjects, including contact persons and persons acting on behalf of the customer as specified in the order agreement, or other persons whose personal data are transferred to the CUSTOMER'S OFFICE, comply with the provisions of Article 13 of the GDPR of the European Parliament and of the Council.

4. Concepts:

- Personal data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to 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;
- “Processing” means any operation or set of operations which is performed on personal data or 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, combination or linking, restriction, erasure or destruction;
- “Restriction of processing”: the marking of stored personal data for the purpose of restricting its future processing;
- ‘Controller’ means a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of

the processing of personal data; where the purposes and means of processing are determined by Union or Member State law, the controller or certain criteria for determining the controller may also be laid down by Union or Member State law;

- “Processor” means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- ‘Third party’ means a natural or legal person, public authority, agency or any body other than the data subject, the controller, the processor or persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- “Consent of the data subject” means a freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by an action which expresses his or her explicit consent, agrees to the processing of personal data relating to him or her;
- “Data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed;
- “Customer” means any person who inquires about the services of the BERUFSBÜRO in person, via the website, by telephone or otherwise, or who enters into a placement agreement with the BERUFSBÜRO.

(5) Scope of personal data, purpose, legal basis and duration of processing

5.1 The processing of data by the CUSTOMER OFFICE is carried out on the basis of contractual or legal obligations or on the basis of voluntary consent.

5.2 The CUSTOMER INTERMEDIARY processes the following personal data of customers for the processing purposes listed below:

5.2.1 Inquiry about legal services via the website, in person, by telephone or otherwise

(a) Name; data necessary to identify the customer

(b) Email address, telephone number; data essential for later contact with the customer

(c) the subject matter of the request (e.g.: details of the planned transaction, other data relating to the matter); the data necessary to clarify the customer’s request and to provide an appropriate, personalized response based on the customer’s own information

The legal basis for processing is the consent of the data subject. Processing takes place for the period specified by the person requesting consent, or until consent is withdrawn.

5.2.2 Individual request for proposals

(a) Name; data necessary to identify the customer

(b) Email address, telephone number; data essential for later contact with the customer

(c) the subject of the request (the circumstances of the matter to which the potential order relates); the data necessary to clarify the customer's request and to provide an appropriate, personalized response based on the customer's own information.

The legal basis for processing is the consent of the data subject. Processing takes place for the period specified by the person requesting consent, or until the consent is withdrawn.

5.2.3 Conclusion and fulfillment of the lawyer contract

(a) Name; data necessary to identify the customer

(b) Email address, telephone number; data essential for later contact with the customer

(c) Data relating to the subject matter of the contract (e.g., details of the property in question, marital status, personal circumstances); definition of the subject matter of the contract, data and circumstances necessary for the performance of the contract, execution of the order

(d) a Pmt. and the Ütv. Legally required data (e.g. data to identify natural persons, copies of identity documents, data on prominent public figures, data to identify natural persons of beneficial owners) – Legally required data.

The legal basis for processing the data is the fulfillment of the contract and the settlement of disputes arising therefrom, as well as the Pmt. and the Ütv. mandatory requirements.

The duration of data processing is the fulfillment of the contract plus five years (general civil enforcement period), the retention period for the created documents that cannot be scrapped is unlimited, the Pmt. and the Ütv. 10 years from the date of termination of the mandate, which can be extended in legally provided exceptional cases.

6. Profiling

The agency does not use automated decision-making, does not create profiles of the data subjects from the available data, nor does it use the data of the data subjects for direct marketing purposes.

7. Recipients and categories of recipients of personal data

The CUSTOMER OFFICE generally shares personal customer data with the following third parties, based on a relationship between the data controllers and the data processors:

- with the BUSINESS BROKER or with organizations that provide services to clients (e.g. insurance companies, auditing firms or IT service providers, etc.);
- with third parties involved in the execution of the contract (counterparties, authorities, courts, experts, legal or other service providers commissioned by the client or by us, notaries);
- Supervisory authorities and other authorities, other regulatory bodies and agencies.

Customers can request personal information about the processing of their personal data by the OFFICE (purpose of processing, legal basis, scope of data, transfer of data, duration of processing) by email: info@vikorlaw.com, Tel.: +36-30-4980444, Address: 1307 Budapest, P.O. Box 54.

8. how personal data is stored and the security of processing

The law firm's computer systems and other data storage are located at headquarters, on the lawyers' mobile devices, and on the respective servers.

The COMPANY selects and operates the IT tools used to process personal data in the course of providing the service, in such a way that the data is processed:

- accessible only to authorized persons;
- Authenticity and verification;
- remains unchanged;
- be protected from unauthorized access.

The CUSTOMER PROVIDER shall take appropriate measures to protect the data, in particular against unauthorized access, alteration, disclosure, publication, deletion or destruction, accidental destruction, damage or loss, and against loss of access due to changes in the technology used.

The CUSTOMER OFFICE ensures the security of data processing through technical, organizational and organizational measures that guarantee an appropriate level of protection commensurate with the risks associated with the processing, taking into account the state of the art.

However, we would like to point out to the individuals concerned that electronic messages transmitted over the internet, regardless of the protocol (e.g., email, web, etc.), are vulnerable to network threats that could lead to fraudulent activities, contractual disputes, or the disclosure or alteration of information. To protect you from such threats, the OWNER AGENCY will take all reasonable precautions.

The data processed by our law firm is primarily accessible to our responsible internal staff (lawyers, trainees, office staff, etc.) and will not be passed on to third parties unless this is done in connection with the engagement of a lawyer or for other legitimate interests (e.g. debt collection), due to legal obligations or with the prior express consent of the data subject.

9. International data transfer to third countries

The personal data of customers may also be transferred to data controllers and processors in countries outside the European Economic Area if this is necessary for the execution of the order

or if the customer has given his or her explicit consent in full knowledge of the facts (Article 49 GDPR).

Before the conclusion of the contract, the billing agency informs the customer that the transmitted data is adequately protected against the recipient outside the European Union to whom the customer's data is transferred:

- (a) the Commission decision pursuant to Article 93 of the General Data Protection Regulation by means of general data protection clauses adopted in accordance with the examination procedure referred to in Article 4(2);
- (b) the acceptance of the data by the supervisory authority and the approval of the data by the Commission in accordance with Article 93 of the General Data Protection Regulation, by means of general data protection clauses approved in accordance with the examination procedure referred to in Article 4(2);
- c) GDPR 40. an approved code of conduct pursuant to Article 16 together with a binding and enforceable commitment by the controller or processor in the third country to apply appropriate safeguards, including with regard to the rights of data subjects, or
- d) GDPR 42. together with a binding and enforceable undertaking by the controller or processor in the third country to implement appropriate safeguards, including with regard to the rights of data subjects. In this context, the Customs Office will endeavor to ensure that the standard contractual clauses for data protection approved by the European Commission/NSAIH are adopted by its partners in third countries.

10. the customer's rights

10.1 Customer access rights

The customer has access to their personal data. If the customer requests information from the customer service department as to whether the customer service department processes their personal data, the customer service department is obligated to provide this information in accordance with legal regulations.

In some cases, the customer service department does not receive any personal data from the data subject. In such cases, we assume that the person from whom we received the data was authorized to provide it to us. If we do not receive the data from the data subject, our obligation to inform the data subject is limited.

However, the CLIENT'S OFFICE is available to the data subject at any time upon request and will provide the requested information within the framework of the legal provisions.

The customer's right to receive feedback as to whether or not the CUSTOMER'S OFFICE processes his or her personal data relates to personal data concerning him or her, but not to personal data not concerning him or her.

The Customs Office grants access to the requesting customer's personal data upon request and provides a copy thereof. If the customer requests an additional/repeated copy of their personal data, the Customs Office may charge a reasonable fee to cover the administrative costs incurred in processing the request, which is to be borne by the customer.

10.2 The customer's right to rectification

The customer has the right to correct their personal data. This right extends to personal data that concerns them and not to personal data that does not concern them.

The CUSTOMER'S OFFICE, upon request of the customer and within the framework of the legal provisions, will correct or complete the customer's personal data and inform the recipients of this personal data (if any) about the correction of the customer's personal data, unless informing the recipients proves impossible or involves a disproportionate effort.

10.3 Customer's right of withdrawal

Under certain conditions, the customer has the right to have their personal data deleted.

The CUSTOMER OFFICE will delete the customer's personal data immediately if the CUSTOMER OFFICE processes this personal data and the customer requests the deletion of their personal data and the personal data is not necessary for the purposes for which the CUSTOMER OFFICE processes the personal data.

The BERUFSBÜRO will delete the client's personal data immediately if the BERUFSBÜRO processes the client's personal data and the client requests the deletion of their personal data and the client withdraws the consent on which the processing of their data is based and there is no other legal basis for the further processing of the client's data.

The OPERATOR shall delete the customer's personal data without undue delay if the processing is necessary for the purposes of the legitimate interests pursued by the OPERATOR or a third party and the customer objects to the processing of his personal data by the OPERATOR and the legitimate grounds for the processing of this personal data do not override the customer's objection.

The PROPERTY will delete the customer's personal data immediately if the customer requests the deletion of their personal data and the processing of this data by the PROPERTY is not unlawful, or the deletion is required by applicable law, or the customer's data was collected in connection with information society services.

The CUSTOMER'S OFFICE will inform the recipients of this personal data (if any) about the deletion of the customer's personal data, unless informing the recipients would be impossible or would require a disproportionate effort.

10.4 The customer's right to restrict processing

Within the framework of the legal provisions, the customer may request the restriction of the processing of his personal data.

A customer's right to request the restriction of the processing of their personal data relates to personal data concerning them, but not to personal data not concerning them.

The CUSTOMER OFFICE will restrict the processing of the customer's personal data for the period in which it verifies the accuracy of this data if the customer requests the restriction of the processing of their personal data and the customer disputes the accuracy of this data.

The CUSTOMER OFFICE will restrict the processing of the customer's personal data if the customer requests the restriction of the processing of data whose processing is unlawful, and the customer objects to the deletion of this data.

The CUSTOMER OFFICE will restrict the processing of the customer's personal data if the customer requests the restriction of the processing of their personal data and the CUSTOMER OFFICE no longer needs this data for the purposes of its processing and the customer needs the data for the establishment, exercise or defense of a legal claim.

The OWNER will restrict the processing of the customer's personal data if the customer objects to the processing of their personal data, which is necessary for the OWNER's legitimate interests, and the customer is awaiting confirmation that there is a legitimate reason for the OWNER to process the customer's personal data that overrides the customer's objection.

The CUSTOMER'S OFFICE will inform the recipients of this personal data (if any) about the restriction of the processing of the customer's personal data, unless informing the recipients would be impossible or would require a disproportionate effort.

If the CUSTOMER'S OFFICE restricts the processing of the customer's personal data, it can.

- to store such personal data,
- can process this personal data based on the customer's consent,
- may process personal data for the establishment, exercise or defense of legal claims or for the defense of the rights of a person.

10.5 The customer's right to data portability

The customer has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance (where technically feasible) from the controller to whom the personal data have been provided, where the processing is based on consent or is necessary for the performance of a contract and the processing is carried out by automated means.

The customer's right to data portability applies to personal data concerning him, but not to personal data not concerning him.

11. Data protection incident

If a potential data breach within the OFFICE's system could lead to a high risk to the rights and freedoms of natural persons, the OFFICE will inform the data subject immediately about the data breach.

12. The customer relationship

If you have any comments, questions or concerns regarding our privacy practices or the use of our services, you can contact us using the contact details on our website.

13 links to other websites

This website contains links to other service providers that are not covered by this privacy policy. When you leave the CUSTOMER OFFICE website, we recommend that you carefully read the privacy policies of all linked websites that collect personal data.

14. other

OUR OFFICE reserves the right to unilaterally amend this privacy policy by notifying the affected persons.

We inform our customers that the investigating authority, the National Authority for Data Protection and Freedom of Information, or other legally authorized bodies may contact the Office for Occupational Safety to obtain information, data, or documents.

15. the rules of procedure

The data controller has 30 days to provide information about the personal data and to delete or correct it. If the data controller does not comply with such a request, they must provide a written explanation for the refusal within 30 days.

16. Data protection authority, legal remedies

You can file a complaint with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information

Head office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Address for correspondence: 1530 Budapest, P.O. Box 5.

Telephone: +36.1.391.1400

Fax: +36.1.391.1410

Email: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

The data subject also has the right to sue the data controller in accordance with the provisions of Infotv.