

Data Privacy Statement

In respect of the electronic correspondence of SUBAN Instruments Hungary Co., effective from 25 May 2018

SUBAN Instruments Hungary Co. (hereinafter referred to as the Company) is committed to the protection of the personal data of its customers and partners. To this end, the Company shall issue the following statement to the data subjects, in conformance to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), and with Act CXII of 2011 on informational self-determination and the freedom of information (Privacy Act).

Table of contents

Contents

Data Privacy Statement	1
Data controller	2
Who are the data subjects?	2
What is the purpose of our data processing during the exchange of e-mails?	2
One-time request for information.....	2
Request for quotations	3
Processing job applications received via email	4
Conclusion of the contract, pre-contractual negotiations	5
Contacts	6
Rights of the data subject.....	7
1. Right to receive information	7
2. Right of access	7
3. Right to rectification	7
4. Right to erasure (right to be forgotten)	7
5. Right to restriction of processing (right to blocking)	7
6. Right to object	8
7. Right to lodge a complaint to the supervisory authority	8
8. Right to effective judicial remedies	9

Data controller SUBAN Instruments Hungary Co.
name:
company reg. Cg. 09-10-000287
number:
tax number: 11622453-2-0
registered seat: H-4032 Debrecen, Füredi str. 98.
telephone: +36 52 507 000
e-mail address: info@suban.hu
website: <http://www.suban-instruments.hu>

Who are the data subjects?

All natural persons or representatives of legal persons are considered data subjects who exchange electronic mails with the data controller, who contact the data controller via e-mail, or who are contacted by the data controller via e-mail.

What is the purpose of our data processing during the exchange of e-mails?

The purpose of data processing during exchanging e-mails can be response to onetime information request, quotation in case of a request for quotations, evaluation of applications in case CVs are sent in connection with recruiting, preparation of a contract prior to conclusion. In all cases, the data of the data subjects are exclusively processed to the extent necessary for the purpose of the e-mail received by our Company.

E-mails can be processed for the following purposes:

One-time request for information

Source of data: The data are provided by the data subjects at the time they send an email to our Company requesting one-time information.

Scope of the data subjects: All natural persons who send an e-mail to any e-mail addresses

description of data	purpose of data processing
name	identifying the data subject
e-mail address	response
content of the question	response

of our Company requesting one-time information. Scope of the processed data:

In case required by the nature of the response (e.g. to protect business secrets), the data controller may check whether you are entitled to such information. In this case the data controller may request you, as the data subject, to provide additional identifiers. Request for such identifiers is explained in all cases.

Purpose of data processing: Providing appropriate information to the data subject.

The legal basis of data processing: the consent of the data subject. If the data subject sends an e-mail to any e-mail addresses of our Company requesting one-time information and expecting response, it is considered the consent of the data subject. The data subject gives its consent to the data processing of its additional data when the data subject provides such additional data for the data controller.

Duration of data processing: e-mails requesting one-time information, as well as the related responses are deleted on the day following the day when you were provided the information sufficiently. In case we are unable to provide you with the requested information due to legal restrictions, all data will be deleted on the following working day and you will be notified of this fact. In case a data subject withdraws from the onetime request for information, all related correspondence will be deleted on the following day.

Data transfer: There is no data transfer in case of one-time request for information.

Exclusively our colleague receiving the e-mail, his/her direct leader, or the management will have access to the data of the data subject.

Request for quotations

Source of data: The data are provided by the data subjects at the time they send an email to our Company requesting quotations.

Scope of the data subjects: All natural persons who send an e-mail to any e-mail addresses of our Company requesting quotations either on their own behalf, or in the name of the legal person represented by them.

Scope of the processed data:

description of data	purpose of data processing
name	identification of the data subject
e-mail address	quotation
content of the requests for quotations	quotation

Purpose of data processing: providing appropriate information to the data subject.

The legal basis of data processing: the consent of the data subject. If the data subject sends an e-mail to any e-mail addresses of our Company requesting quotations and expecting response, it is considered the consent of the data subject.

Duration of data processing: All e-mails related to requests for quotations, as well as any quotations provided to the request will be deleted on the working day following the day such quotations expire. In the event we are unable to offer you a quotation for your request, the correspondence related to such request for quotations will be stored until the working day following the day when we sent you the information on refusing the request for quotations. In case a data subject withdraws from the request for quotations before a quotation was offered, all correspondence related to the request for quotations will be deleted on the following working day.

Data transfer: There is no data transfer in case of a request for quotations.

Exclusively our colleague receiving the e-mail containing the request for quotations, his/her direct leader, or the management will have access to the data of the data subject. In case the data subject accepts our quotation, the related correspondence and the specific

quotation will be forwarded to the employee preparing the contract, therefore our colleague preparing the contract, as well as his/her direct leader will have access to the data.

Processing job applications received via email

Source of data: The data are provided by the data subjects at the time they send their application to our Company for any position.

Scope of the data subjects: All natural persons who send an e-mail with their job application to the e-mail address of our Company: hr@suban.hu applying for any positions.

All applications sent to a different e-mail address will be deleted immediately; we are unable to process them.

Scope of the processed data:

description of data	purpose of data processing
name	identification of the data subject
e-mail address	contact
phone number	contact
data related to qualification	evaluation of application
data on work experience	evaluation of application

Any other data recorded in the curriculum vitae and in the cover letter are not considered during the evaluation.

Purpose of data management: Filling positions advertised by the data controller via the Internet and other media. In case the data controller did not advertise any open positions, all incoming CVs will be deleted immediately, unless the data subject specifically requested the storage of such data until a specified time.

The legal basis of data processing: the consent of the data subject. If the data subject sends an e-mail to the e-mail address of our Company at: hr@suban.hu containing job application.

Duration of data processing: job application documents and e-mails are stored until the relevant position is filled. In case our Company did not advertise any open positions in any media, the incoming CVs will be erased immediately. The data subject may request retaining his/her application documents for a specified period, and in this case we will store the application documents until the end of the specified period, and then it will be erased. In case the data subject requests his/her application documents to be stored for an indefinite period, he/she will be informed that it is not possible at our Company; in case following such notification the data subject fails to specify a definite period for the storage and use of the application documents, they will be erased. In case the data subject requests the erasure of his/her application documents to be erased, we will act according to such request immediately. In case the application is withdrawn by the data subject, the related application materials will be erased on the following working day.

Data transfer: N/A

Exclusively the staff of the HR department, the CEO, and the direct leader involved in the evaluation will have access to the data of the data subject.

Conclusion of the contract, pre-contractual negotiations

Source of data: The data are provided by the partner intending to enter into contract with us, at the time it contacts our Company with the intention of entering into contract and our Company requests to provide its data in e-mail. Scope of the data subjects:

- a) the party to the contract, or
 - b) the natural person signing the contract, acting on behalf of the contracting party, and
 - c) the data of the person assigned as contact person will be included in the contract.
- Scope of the processed data:

a) in case you are the Customer:

description of data	purpose of data processing
name, name at birth, place and date of birth, mother's name	identifying the contracting partner
registration number of the private entrepreneur	identification of the contracting partner
address (registered office in case of private entrepreneur)	identification of the contracting partner

b) in case you are the representative of the Principal as a natural person signing the contract:

description of data	purpose of data processing
name	identifying the representative of the contracting partner
position at the contracted partner	identifying the representation rights

c) in case in the contract you are assigned by the Principal as the contact person:

description of data	purpose of data processing
name	contact
phone number, e-mail address	contact

d) in some cases the ordered service may be so unique that the object of the service itself is suitable for your identification; in such cases the object of the service is processed as personal data, where the purpose of processing the data is determining the framework of the contract.

The above data, recorded in the contract, will be stored - both on paper and electronically - until the expiration date of the contract, that is, until the limitation period pursuant to the Civil Code or other statutory provisions. After 5 years paper-based data will be destroyed using a P-3 security level paper shredder, and any electronic mail related to the contract or to the performance of the contract will be deleted by the data controller.

Lawfulness of data processing:

- a) in case you are a contracting party, processing shall be lawful as defined in Subsection b) of Section (1) of Article 6 of the GDPR, where data processing is necessary for the performance of a contract to which the data subject is party.
- b) in case you are a natural person acting on behalf of the contracting Principal, processing shall be lawful as defined in Subsection b) of Section (1) of Article 6 of the

GDPR, where data processing is necessary for the performance of a contract where you are the legal representative of such party.

- c) in case you are a natural person designated by the contracting Principal as a contact person, the legal basis of the data processing shall also be the performance of the contract, or your any obligation resulting from your employment relationship with the Principal, or from any other civil law contract.

When concluding a contract, exclusively the following persons or bodies shall be entitled to know your data:

- the management of our Company, employees in contractual relationship,
- performance agent specified in the contract,
- the legal representative of our Company reviewing the contract,
- the authority acting during the authority inspection, or any representative thereof.

Duration of data processing: the expiry period resulting from the fulfilment of our obligations under the contract, or specified in the Civil Code or other relevant legislation.

Contacts

Source of data: the data are provided to us by the partner entering into a contract with us, at the time it approaches our Company with the intention of concluding a contract, and is requested by our Company to provide data via e-mail prior to concluding such contract.

Scope of the data subjects: the natural persons assigned as contact persons by our contact partner. Scope of the processed data:

description of data	purpose of data processing
name	contact
Phone number, e-mail address	contact

The legal basis of the data processing: the performance of the contract, your any obligation resulting from your employment relationship with the Principal, or from any other civil law contract.

During contact, exclusively the following persons or bodies shall be entitled to know your data:

- the management of our Company, employees in contractual relationship,
 - performance agent specified in the contract, - the authority acting during the authority inspection, or any representative thereof.
- Duration of data management: The expiry period resulting from the fulfilment of our obligations under the contract, or specified in the Civil Code or other relevant legislation.

Rights of the data subject

1. Right to receive information

Exercising this right is provided in this Statement.

2. Right of access

When this right is exercised, you may request access to your personal Data. Within the scope of this right you may request information from us on the following: the categories of your data concerned, what is the legal basis, purpose and duration of such data processing, how the data were collected, the purpose, legal basis, date and recipient of any data transfer, and who were provided access to such data, when and on what legal basis.

3. Right to rectification

When this right is exercised, in case it is necessary, you may request the rectification and correction of the above data in writing, using the form designed for this purpose (Appendix 1). In conformance to your request, our Company shall be obliged to correct the above data within 3 working days.

For example: If your mailing address, telephone number, or e-mail address has changed, you may request the data controller to enter the new data in its records.

In case of incomplete data you may have your data supplemented. However, in the course of each data processing data additional to the above are not necessary, therefore such data would be processed without a specified purpose. In case you wish to provide a new telephone number or e-mail address, and you do not want the previous ones to be deleted, please indicate the primary contact of the two (old and new) data.

4. Right to erasure (right to be forgotten)

When this right is exercised, you may request the data controller the erasure of your data processed by the data controller on the basis of your consent, unless no obligation to store such data until a specified period is required by the relevant legislation.

In case your data were transferred to a third person by the data controller - and such transfer was not based on legal obligation - you may request the data controller to initiate having your data erased at the recipient.

For example: You may request the deletion of your email address or telephone number from our records, however, this will result that we cannot fulfill our obligations due to lack of communication.

5. Right to restriction of processing (right to blocking)

In case you contest the accuracy of your personal data, you shall have the right to obtain from the controller restriction of data processing until the data controller checks the accuracy of such data, and corrects them if necessary.

You may also request the restriction of your data to certain purpose(s) if the data processing is unlawful but you do not want them to be erased. In this case your data may not be used for the purpose designated by you until you make a statement to the contrary.

For example: In case you sent us your CV when applying for a position, we are entitled to process such CV only until such position is filled. Thereafter it must be erased. In the event we fail to erase such data, they are processed unlawfully. In this case you may request that your data may not be erased, however, you may also stipulate that - although you do not want your data to be erased - you not want your data to be considered for another open position.

You may also request the restriction of the processing of your data in case the data controller no longer needs the personal data for data processing, but you decide to request the further processing of your data for the establishment, exercise or defense of legal claims. In this case, in addition to the restrictive declaration, please make a declaration on your consent to the further processing of your data.

In case you think that the processing of your data violates your legitimate interests, you may restrict the processing of your data until it is determined whether the purpose of the data processing, or the legitimate grounds of the data processing override your legitimate interests.

During the period of the restriction, the blocked personal data may only be stored by the data controller, or they may be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

For example: in case the data controller may have any direct claims against you, the data controller shall be entitled to use your data for judicial means.

6. Right to object

You have the right to object - unless storage or processing of your data provided with your previous consent is required by legislation - on grounds relating to your particular situation, at any time to the processing of your personal data.

The data controller shall not be entitled to use personal data for direct marketing purposes. No profiling shall be performed by the data controller. The data controller shall not process data for scientific or historical research purposes, or for statistical purposes.

7. Right to lodge a complaint to the supervisory authority

In case of complains in respect of the data controller's processing of your data you are entitled to turn to the Hungarian National Authority for Data Protection and Freedom of Information

The contact details of the Authority: Mailing address: H-1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Telephone: +36 1 3911400

E-mail: ugyfelszolgalat@naih.hu

Web: <http://naih.hu>

8. Right to effective judicial remedies

In case you think that we have infringed your rights during the processing of your data, and you wish to lodge a complaint before court, you are entitled to turn to court. In addition, you may seek judicial remedy against the resolution of the data protection authority - pursuant to the general rules of administrative proceedings - by submitting a claim at the competent administrative and labour court.

Appendix 1

Declaration

I, the undersigned

Name:

Place and date of birth:

Mother's name at birth:

Please modify my data as follows (fill in the appropriate section):

Name:

Place of residence:

Place of residence:

Mailing address:

E-mail address:

Telephone:

Please transfer my salary to the following bank account:

I declare that the above data are true and correct, and please enter them in the records of SUBAN Instruments Hungary Co.

I declare that I am aware of the fact that the data controller shall process my data above on the legal grounds of performing a contract (employment contract) and for the purpose of fulfilling legal obligations (Point 3 of Appendix 1 of the Act on the Rules of Taxation).

I declare to understand this Privacy Statement.

Date:.....

Signature