# The

# METALLOGLOBUS Metal Casting and Trading Limited Liability Company PRIVACY POLICY

www.mtgfemonto.hu website on data processing related to its operation

Of legal force: As of 01 November 2023

#### DATA MANAGEMENT INFORMATION

maintained by METALLOGLOBUS Metal Casting and Trading Limited Liability Company mtgfemonto.hu data processing related to the website

#### INTRODUCTION

Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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 referred to as "the Regulation") provides that the controller shall take appropriate measures to concisely provide the data subject with each communication relating to the processing of personal data, in a transparent, intelligible and easily accessible form, using clear and plain language, and that the Data Controller facilitates the exercise of the rights of the data subject.

The obligation of prior information of the data subject is also prescribed by Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

With the information below, we inform you about the data processing related to the use and operation of the website operated by METALLOGLOBUS Metal Foundry and Trade Limited Liability Company on the mtgfemonto.hu website and we comply with the above legal obligation.

#### **CHAPTER I**

#### NAME OF THE CONTROLLER

The publisher of this information and the Data Controller is:

Company: METALLOGLOBUS Metal Casting and Trading Limited Liability Company

Seat: 1108 Budapest, Sírkert A. 2-4.

Company registration number: 01-09-681224

VAT number: 11882183-2-42

Statistical symbol: 11882183-2454-113-01

Court of registration: Registry Court of the Budapest Regional Court

Authorised to represent: Kelly Zsófia
E-mail contact: ontode@mtgfemonto.hu
Telephone number: 06306188070

#### **CHAPTER IIDATA MANAGEMENT**

This Privacy Policy informs the data subjects about the data processing arising in connection with the activities of the Data Controller related to the use of the website. The website presents the activities of the data controller, as a result of which those interested in the services can establish a relationship with the data controller.

The website does not contain any webshop function, it only serves the possibility of establishing contact and informing interested parties.

The Data Controller may transfer data within the group of companies within the European Union.

Automated decision-making or profiling is not used by METALLOGLOBUS Metal Casting and Trading Limited Liability Company.

#### Data transfer outside the EU:

The data processed in connection with the use of Google and Facebook systems may be stored outside the EU, on servers located in the United States of America.

#### 1. CONTACT

## 1.1. Customer correspondence, contact form, online inquiry

Those interested have the opportunity to contact the Data Controller by e-mail, letter or by filling out the website contact form and the online request for quotation form.

Data subjects: person voluntarily contacting

**Scope of processed data:** in case of contact via e-mail and post, the data provided voluntarily. When filling out the contact and online request for quotation form, we process contact name, company name, contact telephone number, city, e-mail address and other data provided voluntarily. Please provide only as much information as is necessary for the purpose of contacting us.

## Purpose of data processing:

Establishing contact with a prospective business partner, performing a concluded contract, business contact, facilitating the conclusion of a contract

**Legal basis for data processing:** processing is necessary for the performance of a contract, prior to entering into a contract or at the request of the data subject [Article 6 (1) (b) GDPR1

## Time of data processing:

The Company shall provide letters and customer inquiries received by post with an arrival date. The Company shall delete the received mailings and e-mails, together with the sender's name and e-mail address and other voluntarily provided personal data, after a maximum of 1 year from the date of disclosure, if no permanent contractual relationship has been established between the parties.

The contact form generates an e-mail for the data controller, so we treat inquiries from there in the same way as above.

## The recipient of processed data may be: (data may be transferred to)

- Website hosting provider:

Task: providing online storage

Company: Hungarian Mediacenter Fft.

Address: 6000 Kecskemét, Erkel Ferenc utca 5.

Email: mediacenter@mediacenter.hu

Depending on the functions of the website, the provider of the hosting of the website may be the recipient of data, but does not process personal data according to the current settings.

The data entered into the contact form are not stored on the hosting of the website, the message of the interested parties is forwarded by the engine of the website to the Data Controller by e-mail without human intervention, the hosting provider of the website does not have access to these data and does not perform any data management operation on them.

#### 1.2. Contact us by phone

If you decide to contact our company by phone and ask our company for feedback on your case, our colleague may record the data necessary for handling the case and feedback during the phone call. In the case of telephone conversations for general informational purposes, our company does not record personal data, no audio recordings are made of the conversations.

The scope of processed data can be: name, telephone contact or e-mail address of the caller, purpose and reason of the call.

Purpose of data processing: service according to the needs of the caller, feedback on questions

**Legal basis** for data processing: data processing is necessary for the performance of a contract or for taking steps at the request of the data subject prior to entering into a contract [Article 6 (1) (b) of the GDPR] **Duration of data processing:** we will keep your data collected in connection with your inquiry for 1 month after the end of your case, unless your request qualifies as another data processing purpose.

The consequence of failure to provide data is that our company cannot comply with your request.

#### 2. PROCESSING OF DATA RELATED TO THE EXISTENCE OF A CONTRACTUAL RELATIONSHIP

If you enter into a contractual relationship with our company, we process the data contained in the contracted staff, e-mails generated during the relationship, contact phone numbers, accounting and financial documents.

Data subjects: representatives and contact persons of individuals or organizations in contractual relationship

**Purpose of data processing:** fulfillment of contractual obligations, effective communication and communication, issuing invoices, fulfillment of accounting obligations, protection of legal interests

## Legal bases and retention periods:

- data proving contractual content until the conclusion of the legal transaction on the legal basis performance of the contract (1) b) GDPR, then for 5 years after the conclusion of the legal transaction on the legal basis on the legal basis (1) (f) in case of legal enforcement
- e-mail address and telephone number of natural person contact persons of legal persons are processed on the legal basis of legitimate interest pursuant to point (f) of paragraph 1 of the GDPR, for 5 years after the existence of the legal relationship. In the event of a change in the contact person, your data will be deleted immediately, but may be included in our e-mail system and backups.
- financial documents for 8 years from their issuance pursuant to §§ 165 and 169 (2) of the Act on Legal Basis of Legal Obligation pursuant to Section (1) (c) of the GDPR

# The recipients of personal data may be: (data may be transferred to)

It is accessible to employees of the Company performing tasks related to customer service, accounting and taxation.

The Data Controller issues an invoice for the payment obligation of the contracting parties using the services of an ERP program called \_AZ Software, within the framework of which the operator of the invoicing software receives the billing data of the contracting parties, which in certain cases may contain personal data.

The data controller's invoices (with the data content contained therein) are forwarded to the <u>accounting data processor</u>.

The data controller's contracts and the content of correspondence related to legal transactions may be forwarded to <u>data processors providing</u> legal services in the event of a legal dispute.

Details of data processors can be found in Chapter III of this prospectus.

# 3. DATA PROCESSING RELATED TO THE OPERATION OF THE WEBSITE

# 3.1. Use of cookies:

#### General information about cookies:

Cookies are small data files that are placed on the user's computer by the visited website. The purpose of cookies is to make the given infocommunication and internet service easier and more convenient. A cookie contains a series of characters that are placed on a visitor's computer when they visit a website. When you visit the website again, the cookie allows the website to recognize the visitor's browser. Cookies may also store user preferences (e.g. preferred language) and other information. Among other things, they collect information about the visitor and his/her device, remember the visitor's individual settings, and may be used, for example, when using online shopping carts. In general, cookies facilitate the use of the website, help the website to provide users with a real web experience and an efficient source of information, furthermore, they provide the website operator with control of the operation of the site, prevent abuse and provide the services provided on the website uninterrupted and at an appropriate level.

Some of them are so-called temporary cookies, which are only placed on the user's device during a specific session (e.g. during the security identification of an internet banking), the other type is a permanent cookie (e.g. language setting of a website), which remains on the computer until the user deletes it.

According to the directives of the European Commission, cookies [unless they are strictly necessary for the use of the given service] can only be placed on the user's device with the user's permission.

In accordance with general internet practice, our Company also uses cookies on its website.

## The cookies used by our Company can be classified into the following groups:

**Necessary cookies** – necessary cookies help us to use the website, enabling basic functions such as navigating the site. The website cannot function properly without these cookies.

**Preference cookies** – When enabled, they allow the website to remember information that affects the behavior or appearance of the website. In our case, this includes the user's preferred language, the user's region, keeping the contents of the basket even after leaving the site (name of cookie: jshopping\_temp\_cart). Or, if you have a user account, this cookie (called joomla\_user\_state) is set to keep you logged in every time you visit the site.

**Statistics cookies** – (Google analytics) With the explicit and substantiated consent of the Data Subject, they help us understand how users interact with websites by collecting and transmitting information anonymously.

# Legal basis for the use of cookies:

The legal basis for processing cookies and extensions necessary for the operation of the website is Article 6 (1) (f) of the GDPR, preference and statistical cookies are processed by the data controller with the express consent of the website visitor (Article 6 (1) (a) of the GDPR).

Please note that accepting cookies may also result in your cookie data being processed outside the European Union or the European Economic Area.

With your explicit consent, we use cookies, web beacons and pixels to display advertisements to Users via Google and Facebook. Data processing takes place without human intervention.

Our website is operated using <u>a Joomla content management system</u>, during which add-ons (plugins and modules) can be installed.

#### Manage cookies:

Accepting and enabling cookies is not mandatory. You can reset your browser settings to reject all cookies or to notify you when a cookie is being sent. Although most browsers automatically accept cookies by default, these can usually be changed to prevent automatic acceptance and to offer you the choice each time. The cookies used on the website alone are not suitable for identifying the user personally.

You can find information about the cookie settings of the most popular browsers at the links below:

- Google Chrome:https://support.google.com/accounts/answer/61416?hl=hu
- Firefox:https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn
- Microsoft Internet Explorer 11: <a href="http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11">http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11</a>
- Microsoft Internet Explorer 10: <a href="http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7">http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7</a>
- Microsoft Internet Explorer 9: <a href="http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9">http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9</a>
- Microsoft Internet Explorer 8: <a href="http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8">http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8</a>
  - Microsoft Edge:http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq
  - •Safari:https://support.apple.com/hu-hu/HT201265

However, please note that certain website features or services may not function properly without cookies or plugins.

#### First or third party cookies:

Cookies are set either by us (first-party cookie) or by a third party cookie.

If we display various contents on the website with the help of external web services, this may result in the storage of some cookies that are not controlled by RK60 Kft. as Data Controller, so we have no influence on

what data these websites or external domains collect. Information about these cookies is provided in the policies of the respective service, below we briefly inform you about the activities of these providers.

## Google Analitics:

The name of the data processor is as follows:

Name: Google LLC

Cím: Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, California

94043

Website: https://www.google.com/

Stored data can be: website visit data, calendar entries, phone contacts, unique user identifiers, visitor identification cookie

Google Analytics is Google's analytics tool that helps website and app owners get a better picture of their visitors' activities. The service may use cookies to collect information and report statistics on website usage without individually identifying visitors to Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reporting website usage statistics, Google Analytics, along with some of the advertising cookies described above, may also be used to show you more relevant ads across Google products (like Google Search) and across the web.

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"), which uses "cookies". These text files are saved on your computer and allow an analysis of how you use the website. The information generated by the cookie about your use of the website is usually transmitted to and saved by a Google server in the United States of America. The IP address will be shortened or anonymised by Google during transmission within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.

Google, on behalf of the controller, will use this information to evaluate your use of the website, to compile reports on website activity, to compile demographic reports and to provide other services related to website and internet usage to the controller.

Google Analytics' data collection settings include special settings for remarketing, ad reporting, and ad personalization, so we will use the data collected for marketing purposes if you give your consent. Google Analytics processes the collected data for a period of 26 months. Information collected by Google may be shared with Google Ads.

The company may use Google's "Similar Audiences" feature, which allows us to advertise to people with similar interests.

Further information about the cookies used by Google Analytics is available at: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>

Users who do not want their activity on the site to be displayed in Google Analytics statistics can disable the transmission of information to Google Analytics by installing the so-called Google Analytics Opt-out Browser Add-on installed as an add-on to their browser. For more information about installing this extension, see: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>

#### Google Ads, Remarketing, Conversion Tracking

We use Google Ads adware using data from Google Analytics. Google displays our ads on websites as a third-party service provider.

Remarketing allows us to tailor our ads to users who have previously visited our website, and to set bids and ads (using dynamic remarketing) to reach those visitors when they browse the web or use apps.

When someone visits your website, the visitor's cookie ID is added to your remarketing list. Google uses cookies to customize the ads you see on Google products, such as Google Search. For example, these

cookies are used to remember your recent searches, past interactions with individual advertisers' ads or search results, and visits to advertisers' websites.

You can disable cookies from third-party providers in your device settings or on the Google Marketing Platform opt-out page: https://adssettings.google.com/authenticated?hl=hu#display\_optout

Within Google Ads, we use Google's **conversion tracking** service.Google conversion tracking is an analytics service provided by Google Inc.

When the User accesses a website through a Google ad, a cookie necessary for conversion tracking is placed on his/her computer. The validity of these cookies is limited. When the User browses certain pages of the website and the cookie has not yet expired, both Google and the Data Controller can see that the User clicked on the advertisement.

Google Ads also **adds features independent** of Google Analytics to the website, whereby Google Ads uses its own measurement code through Tag Manager for remarketing and conversion tracking, during which general visit data is transmitted to Google.

You can use the Google Ads advertising system **to create** lookalike audience lists. Similar audience targeting lets you show ads to people who share characteristics with people on your existing remarketing lists.

## Facebook remarketing:

For our online offers, we may use the advertising system of the social network Facebook (operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA or, if you are an EU citizen, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook") and the "Facebook Pixel" service provided by it.

Facebook Pixel allows Facebook to target viewers of our offer for the purpose of displaying so-called "Facebook Ads" advertisements. Accordingly, we only use Facebook Pixel to serve Facebook Ads created by us to Facebook users who are interested in our online offerings. By using Facebook Pixel, we want to ensure that our Facebook Ads match users' potential interests and are not distracting. At the same time, Facebook Pixel allows us to track the effectiveness of Facebook advertising for statistical and market research purposes, as it informs us whether users have used our website by clicking on the Facebook ad. You have the right to object to the collection of data by Facebook Pixel and the display of your information in Facebook ads. To do this, please visit the relevant page (https://www.facebook.com/settings?tab=ads) created by Facebook and follow the instructions for setting up usage-based advertising or find out about your pages: (USA) riahts following http://www.aboutads.info/choices/ the and http://www.youronlinechoices.com/ (EU). Settings are platform-independent, meaning they can be applied to all devices, including desktop and mobile.

#### Google Tag Manager

Google Tag Manager is an address management service provided by Google Inc. that allows you to create, update and manage tags. Tags are small code elements on our website that, among other things, are used to measure traffic and visitor behavior, determine the impact of online advertising and social channels. When you visit our website, the current tag configuration is sent to your browser. The tool itself does not collect any personal data, but ensures the activation of other tags, which, in turn, may potentially collect data.

For more information how Google Tag Manager works. please visit: https://support.google.com/tagmanager/answer/6102821?hl=hu and in the terms of use: https://www.google.de/tagmanager/use-policy.html

#### 4. OTHER DATA PROCESSING:

In the course of our service, data processing not listed in this prospectus may occur. In such a case, when collecting the data, we will inform you in writing how, for what purpose, on what basis we will process your data during the current data collection, how long we will keep it and what rights you have in connection with data processing.

We inform our clients that the court, the prosecutor, the investigating authority, the misdemeanour authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, or other

bodies authorized by law may contact the data controller to provide information, disclose or transfer data or provide documents.

The Data Controller shall disclose personal data to the authorities – if the authority has indicated the exact purpose and scope of the data – only to the extent and to the extent that is strictly necessary to achieve the purpose of the request.

## **CHAPTER IIIDATA processors**

Your personal data may be processed by our employees and by data processors who have concluded a written data processing contract with us.

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller; (Regulation Art. 4 (8))

Both our employees, data processors and their direct colleagues may process your data only to the extent necessary to achieve the purpose of data processing and for the time provided by the legal basis. Data processors do not make independent decisions, they are only entitled to act in accordance with the contract concluded with us and the instructions received. We control the work of our data processors, our data processors are only entitled to use another data processor with our consent.

The use of a data processor does not require the prior consent of the data subject, but it is necessary to inform him. Accordingly, we provide the following information.

## Our data processors:

Accounting	Fourexperts Kft. Tax number: 26244420-2-43 Company registration number: 01-09-309866 Headquarters: 1213 Budapest, Szentmiklósi út 102. Email: info@fourexperts.hu	regular
Invoicing	A-Z Software Ltd. Tax number: 25817786-2-13 Company registration number: 13-09-184258 Headquarters: 2084 Pilisszentiván, Borbála utca 26 Email: support@az-szoftver.hu	regular
Payroll	Prohuman 2004 Workforce Service and Consulting Ltd. Tax number: 13410021-2-44 Company registration number: 01-09-992836, Headquarters: 1146 Budapest, Hungária krt. 140-144. E-mail: cegugyek@prohuman.hu	
Legal services	Dr. Polgar Law Office Headquarters: 1061 Budapest, Liszt Ferenc tér 5. E-mail: polgar@polgardr.hu	Ad hoc
IT service provider, email server	PROTOLINK Kft. Tax number: 14566321-2-42 Company registration number: 01-09-909729 Headquarters: 1144 Budapest, Szentmihályi út 20-22. 1st floor 36. E-mail: office@protolink.hu	regular

website hosting provider and website operator	Hungarian MediaCenter Fft. Tax number: 13922546-2-03 Company registration number: 03-09-114492 Headquarters: 6000 Kecskemét, Erkel Ferenc utca 5. Email: mediacenter@mediacenter.hu	regular
Website visit data analysis, advertising	Google LLC through Google Analytics and Google Ads Cím: Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, California 94043 Website: https://www.google.com/	regular

# **CHAPTER IV**

## STORAGE OF DATA, SECURITY OF DATA MANAGEMENT

The Data Controller selects and operates the IT tools used to process personal data during the provision of the service in such a way that the data processed:

- (a) accessible to authorised persons (availability);
- b) its authenticity and authentication is ensured (credibility of data processing);
- (c) its unchangedness can be demonstrated (data integrity);
- d) protected against unauthorized access (confidentiality of data) Be.

The Data Controller protects the data with appropriate measures, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage, and becoming inaccessible due to changes in the technology used.

In order to protect the data files processed electronically in its various records, the Data Controller shall ensure with appropriate technical solutions that the stored data – unless permitted by law – cannot be directly linked and assigned to the data subject.

With regard to the current state of the art, the Data Controller shall ensure the protection of the security of data processing with technical, organizational and organizational measures that provide a level of protection appropriate to the risks arising in connection with data processing.

The Data Controller retains it during data processing

- a) confidentiality: protects information so that only authorized persons can access it;
- (b) integrity: protects the accuracy and completeness of the information and the method of processing;
- c) availability: ensures that when the authorized user needs it, he can actually access the required information and the related tools are available.

The IT system and network of the Data Controller and its partners are protected against computer-aided fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, computer burglaries and attacks leading to denial of service. The operator ensures security with server-level and application-level protection procedures.

We inform users that electronic messages transmitted over the Internet, regardless of protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that lead to fraudulent activity, contract dispute, or disclosure or modification of information. In order to protect against such threats, the data controller shall take all reasonable precautions. Systems are monitored in order to record any security deviations and provide evidence in case of any security incident. System monitoring also makes it possible to verify the effectiveness of the safeguards applied.

#### **CHAPTER V**

## INFORMATION ON THE RIGHTS OF THE DATA SUBJECT

## Right to prior information

The data subject shall have the right to be informed of the facts and information related to data processing prior to the commencement of data processing.

(Articles 13-14 of the Regulation)

## Right of access by the data subject

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and related information specified in the Regulation.

(Article 15 of the Regulation).

## Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

(Article 16 of the Regulation).

# Right to erasure ('right to be forgotten')

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds specified in the Regulation applies. (Article 17 of the Regulation)

#### Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where the conditions set out in the Regulation are met.

(Article 18 of the Regulation)

### Notification obligation related to rectification or erasure of personal data or restriction of processing

The Data Controller shall communicate any rectification, erasure or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. At the request of the data subject, the Data Controller shall inform him or her of these recipients. (Article 19 of the Regulation)

## Right to data portability

Subject to the conditions laid down in the Regulation, the data subject shall have 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 have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

(Article 20 of the Regulation)

#### Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her on the following legal bases:

- -Article 6(1)(e) of the Regulation (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or
- f) (processing is necessary for the enforcement of the legitimate interests of the Data Controller or a third party).

In that case, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

(Article 21 of the Regulation)

## Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

(Article 22 of the Regulation)

#### Restrictions

Union or Member State law to which the controller or processor is subject may restrict by legislative measures in accordance with the rights and obligations provided for in Articles 12 to 22 and Article 34 and Articles 12 to 22

(Article 23 of the Regulation)

# Communication of the personal data breach to the data subject

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall communicate the personal data breach to the data subject without undue delay. (Article 34 of the Regulation)

## Right to lodge a complaint with a supervisory authority (right to an official remedy)

The data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the Regulation. (Article 77 of the Regulation)

## Right to an effective judicial remedy against a supervisory authority

Every natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them or where the supervisory authority does not handle a complaint or does not inform the data subject within three months of the progress or outcome of the complaint lodged.

(Article 78 of the Regulation)

#### Right to an effective judicial remedy against a controller or processor

Each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.

(Article 79 of the Regulation)

#### **CHAPTER VI**

# SUBMISSION OF THE DATA SUBJECT'S REQUEST, MEASURES OF THE CONTROLLER

The data subject may request information about the processing of his or her personal data, and may request the rectification or, with the exception of mandatory data processing, erasure or blocking of his or her personal data in the manner indicated at the time of data collection, or by email or post.

The Data Controller shall inform the data subject without undue delay, but in any event within one month of receipt of the request, of the measures taken in response to his or her request to exercise his or her rights.

If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The Data Controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay.

Where the data subject makes the request by electronic means, the information shall, where possible, be provided by electronic means, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Data Controller shall provide the information pursuant to Articles 13 and 14 of the Regulation and information on the rights of the data subject (Articles 15-22 and 34 of the Regulation) and measures free of charge. If the request of the data subject is manifestly unfounded or excessive, in particular because of its repetitive character, the Data Controller may refuse to act on the request, taking into account the administrative costs involved in providing the requested information or communication or taking the requested action, but the burden of proving that the request is manifestly unfounded or excessive shall lie with the Data Controller.

If the Data Controller has reasonable doubts about the identity of the natural person submitting the request, it may request the provision of additional information necessary to confirm the identity of the data subject.

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

The Data Controller, as data controller, shall provide information on the data processed by it or by the processor entrusted by it, their source, the purpose, legal basis, duration of data processing, the name, address and activities of the data processor related to data processing, as well as, in case of data transfer, its legal basis and recipient. The controller shall provide the information in writing as soon as possible from the submission of the request. This information is free of charge if the person requesting information has not yet submitted a request for information on the same set of data to the controller in the current year. In other cases, the Data Controller shall determine the reimbursement of costs.

The Data Controller may not delete the data of the data subject if it is based on a contract, the performance of a legal obligation or the legitimate interest of the Data Controller.

In the case of data processing based on legitimate interest, the data subject has the right to object pursuant to Article 21 of the Regulation, i.e. he or she may object to the processing at any time. In that case, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

The Data Controller shall compensate for any damage caused to others by the unlawful processing of the data of the data subject or by violating the requirements of data security. The data controller shall be exempted from liability if the damage was caused by an unavoidable cause outside the scope of data processing. It does not compensate for damage to the extent that it resulted from intentional or grossly negligent conduct on the part of the injured party.

Legal remedies and complaints may be lodged with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information

Headquarters: 1055 Budapest, Falk Miksa u. 9-11.

Website: http://www.naih.hu Phone: 06.1.391.1400

Fax: 06.1.391.1410

E-mail: ugyfelszolgalat@naih.hu

In case of violation of his rights, the data subject may also turn to court against the data controller. The court shall deal with the case as a matter of priority.

#### Updating information, tracking changes in legislation

The Privacy Policy is continuously reviewed and updated by the data controller in accordance with changes in the legal environment and the expectations of the authorities. You can keep up to date with the current Policy under the "Privacy Policy" section of the website.

Budapest, 2023. november 01.

METALLOGLOBUS Metal Casting and Trading Limited Liability Company