

INFORMATION ON DATA MANAGEMENT, DATA PROTECTION

**for tenderers and prospective partners (customers, suppliers, subcontractors)
who register on the website (<https://www.hsp.hu>)**

The purpose of this information and regulations of HSP Ltd. is to comply with the legal requirements of CXII of 2011 on the right to self-determination of information and freedom of information. Act (hereinafter: Info by law.) and with regard to the provisions of Regulation (EU) 2016/679 [GDPR] of the European Parliament and of the Council (27.04.2016), inform the data subjects about the scope of their personal data managed by the data controller contained in point 2, the purpose and method of data management, as well as all other facts related to the management of data, including, in particular, but not exclusively, their rights in relation to data management and the legal remedies available to them.

1. Basic concepts:

1.1. Affected: the contact person of the requester, prospective customer, subcontractor, supplier who registers and makes contact on the Company's website (www.hsp.hu).

1.2. data management: any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, systematization, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or making accessible in any other way by item, coordination or connection, restriction, deletion or destruction.

1.3. personal data: any information relating to an identifiable or identified Data Subject; a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person can be identified.

2. Data manager and contact information:

- Name: HSP Ltd.
- Headquarter: 2351 Alsónémedi, 2405/4 hrsz.
- Legal representative: Zoltán Kállai, managing director (senior official)
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At our company, the appointment of the data protection officer is decreed, or by law is not mandatory
Entrusted with data management, data collection and data protection:

- - Andrea Kun, financial director – tel: 29-537-640, email: kun.andrea@hsp.hu
- - Krisztina Makrai, office manager - tel: 29-537-640, email: makrai.krisztina@hsp.hu

3. Scope of managed data, purpose of data management, legal basis, recipients, duration of data storage: information sheet no. 1 according to its annex.

4. Source of personal data:

The processed personal data is made available to the Data Controller by the Data Subject him/herself or by the Contracting Party, by registering on the website (www.hsp.hu) and contacting them.

5. Rights of the Data Subject:

The Data Subject is entitled to the following rights in relation to the data management carried out by the Data Controller:

5.1. The Data Subject's right of access:

At our contact details, the Data Subject has the right to receive appropriate information at any time about whether his personal data is being processed by our Company and, if so, the Data Subject is entitled to access his personal data stored by us, and can request a copy of them, or request information about how we handle your personal data.

5.2. A Right to rectification

The Data Subject has the right to request that our Company correct or correct inaccurate data or supplement incomplete data without undue delay.

5.3. The right to erasure ("the right to be forgotten")

The Data Subject may request that we delete certain personal data stored by us without undue delay, if:

- henceforth, our Company no longer needs the given data for the purpose for which it was collected or otherwise handled;
- it is data processing that was based on the Data Subject's consent, but the Data Subject withdrew his consent and there is no other legal basis for the data processing;
- it is a case of data processing that was based on the legitimate interests of the Data Controller or a third party, but the Data Subject objected to the data processing and - except for the objection against data processing for the purpose of direct business - there is no overriding legal reason for the data processing,
- the personal data was handled illegally by our Company or
- if personal data must be deleted to fulfill a legal obligation required by law.

Our company is not obliged to delete data every night based on Article 17 (3) of the GDPR, especially e.g. in the event that data processing is necessary for the presentation, enforcement and protection of legal claims.

5.4. The right to restrict data processing

The Data Subject has the right to request the restriction of the processing of his personal data if:

- the Data Subject disputes the accuracy of the processing of his personal data by our Company - in this case, the limitation applies to the period that allows our Company to check the accuracy of the personal data;
- the data processing is illegal, but the Data Subject opposes the deletion of the data and instead the Data Subject requests the restriction of their use;
- Our company no longer needs your personal data, but the Data Subject requires it to submit, enforce or defend a legal claim;

- The Data Subject objected to data processing - in this case, the restriction applies to the time until it is established that the legitimate reasons of our Company take precedence over the legitimate reasons of the Data Subject.

During the restriction period, data management operations, not including storage, may not be carried out, or they may only be handled in a scope to which the Data Subject has consented, or even in the absence of such consent, our Company may process the data required to submit legal claims. are necessary for its enforcement or protection or for the protection of the rights of another natural or legal person or in view of the important public interest of the EU or an EU member state. Our company will inform you in advance about the lifting of the restriction.

5.5. The right to data portability

The Data Subject may at any time request that, on the basis of his consent or on a contractual legal basis, his personal data managed by our Company be made available to the Data Subject in a segmented, widely used, machine-readable format, and - if otherwise technically feasible - at the Data Subject's request, our Company will directly transmit the personal data to a for another data controller. In the event that the exercise of the right to data portability would adversely affect the rights and freedoms of others, our Company is entitled to refuse the Data Subject's request to the extent necessary.

5.6 Right to protest

If the legal basis of the data management is the legitimate interest of our Company or a third party, the Data Subject has the right to object to the data management. In this case, the Data Subject's personal data will no longer be processed. At the same time, our Company is not obliged to accept the protest if our Company proves that:

- data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the Data Subject or
- data management is related to the presentation, enforcement or protection of the legal requirements of our Company.

5.7. Right to remedy

If the Data Subject considers that his rights according to the data protection legislation in force at all times have been violated, he has the right to file a complaint with the National Data Protection and Freedom of Information Authority. Contact details of the National Data Protection and Freedom of Information Authority: Website: <http://naih.hu/>; Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; Postal address: 1530 Budapest, Pf.: 5.; Phone: +36-1-391-1400; Fax: +36-1-391-1410; E-mail: ugyfelszolgalat@naih.hu.

The Data Subject has the right to file a complaint with a supervisory authority established in another European Union member state, especially in his or her usual place of residence, workplace or the place of the suspected infringement. The Data Subject may - regardless of his right to file a complaint - go to court if his rights according to the GDPR have been violated during the processing of his personal data. A lawsuit can be brought against our company, as a data controller with a domestic place of business, before a Hungarian court. The person affected by the lawsuit is the current Infotv. Section 22 (1) can also be brought before the court of your place of residence. The contact details of the courts in Hungary can be found at the following link: <http://birosag.hu/torvenyszekek>. Given that the Data Controller is not a public authority of the Member State exercising its public authority, the person concerned is sued by the competent and competent authority of the Member State of habitual residence. can also be initiated in your court, if the Data Subject's habitual residence is in another member state of the European Union.

Furthermore, the Data Subject has the right to appeal to the court against the legally binding decision of the supervisory authority regarding the Data Subject.

6. Profiling

No automated decision-making or profiling takes place during our company's data management of the Data Subject.

7. Data security

The data controller undertakes to ensure the security of personal data and to take the technical measures that ensure that the managed personal data are protected against unauthorized access, destruction, modification or use.

No. 1 annex

Data management information for registrants, prospective partners (customers, suppliers, subcontractors)

Our company processes the following personal data of the person registering on the website, for the purposes defined here, on a legal basis and for a period of time:

The processed data	Purpose of data management	Legal basis for data management	Data transfer addressee	Duration of data storage
Company name, contact person name, position, e-mail address, number	Sending offers, facilitating the conclusion of a contract, a connection recording, the data in an electronic database recording, storage,	- Legitimate interest in GDPR Article 6 (1) Paragraph on the basis of point: admission of partnership, fostering, facilitating the conclusion of a possible giving offers - performance of the contract / Article 6 (1) GDPR point b) -voluntary consent Article 6 (1) GDPR	- HSP Ltd. its agents dealing with data management (point 2)	- sin the case of a twin request for proposal, in the case of a contract, according to the rules for concluding a contract - in case of refusal of the offer, for 3 months after the day of refusal, - if no response to the offer is received, for 3 months from the day after the end of the binding offer