

**DATA MANAGEMENT NOTIFICATION  
REGARDING THE MANAGEMENT OF THE DATA OF NATURAL PERSONS (DATA SUBJECTS) BY AQ ANTON KFT. AND  
THE RIGHTS OF THE DATA SUBJECTS**

Effective as of 25th May 2018  
**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 Regulation) stipulates that Data Controller shall take appropriate measures to provide any information relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, as well as Data Controller shall facilitate the exercising of the rights of data subject.*

*The obligation to notify the data subject in advance is stipulated by Act CXII of 2011 on The Right to Informational Self-determination and the Freedom of Information as well.*

*Through the notification below, we comply with this statutory obligation.*

*We publish the notification on the website of our company, or we send it to the data subject upon his/her explicit request.*

1. The issuer and also the **Data Controller** of the present notification is:

<b>COMPANY NAME:</b>	<b>AQ Anton Kft</b>
<b>REGISTERED SEAT:</b>	<b>H-8900 Zalaegerszeg, Sport u. 16.</b>
<b>COMPANY REGISTRATION NUMBER:</b>	20-09-061216
<b>TAX NUMBER:</b>	11342261-2-20
<b>WEBSITE:</b>	<b><a href="http://www.anton.hu">www.anton.hu</a></b>
<b>E-MAIL ADDRESS:</b>	<b><a href="mailto:info.aganton@agg.se">info.aganton@agg.se</a></b>
<b>TELEPHONE NUMBER:</b>	<b>+36 92 550 010</b>

(hereinafter referred to as **Company or Data Controller**)

2. **Legal basis of the data management:** the effective Act CXII of 2011 (“Privacy Act”), Article 6(1) of Regulation (EU) 2016/679 Of the European Parliament and of the Council effective from 25<sup>th</sup> May 2018 (“GDPR”), as well as the effective legal, accounting and taxation provisions. In the following, we will present the details of the data management according to the specific data management purposes.

3. **Data management purposes:** as specified in the chart to be found at the end of this notification

4. **Period of storage of the personal data:** detailed in respect of each data management purpose in the chart to be found at the end of this notification

5. **Data security:** In order to ensure protection of the personal data, our Company maintain an appropriate information security policy in effect, and it restricts access to the data by determining the authorization levels. In order to ensure the security of the information technology systems, our company protects those by firewall, as well as uses virus detection and anti-virus programme. Our Company ensures the controlling of the incoming and outgoing communication conducted via electronic means.

6. **Data processor:** Our Company uses the eservices of Nexon Vállalkozási és Kereskedelmi Kft. as data processor, H-1138 Budapest Váci út 186. Company registration number: 01-09-062647, website: [www.nexon.hu](http://www.nexon.hu).

7. **Rights and opportunities of legal remedy related to data management:** The natural person may request the following from the data controller:

- may request information regarding the management of his/her personal data,
- may initiate the rectification of his/her personal data,
- except for mandatory data management, may request the erasure of his/her personal data,
- may object to the management of his/her personal data,
- may initiate an inspection with the Hungarian National Authority for Data Protection and Freedom of Information ((<http://naih.hu>; H-1530 Budapest, Pf.:5; telephone: +36 1 391 1400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) with reference to that an injury occurred related to the management of the personal data.

Data Controller shall provide information upon the request or inquiry of the natural person, within the deadline specified by the prevailing laws. If necessary, taking into consideration the complexity of the request and the number of requests, this deadline may be extended by an additional two months. Data Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject. If Data Controller does not take action on the request of the data subject, the Data 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.

8. Our Company **is not obliged to appoint a data protection officer.**

9. The present data protection notification is **available** at the [www.anton.hu](http://www.anton.hu) website. Our Company may modify the present notification unilaterally and in respect of the future, of which modification the data subjects will be notified by the company through the website of the company.

<b>Description and purpose of the data management</b>	<b>Legal basis of the data management</b>	<b>Scope of the data managed</b>	<b>Duration of the management</b>	<b>Who have access to the data</b>
<b>Management of the data and resumes of applicants, for the purpose of assessment and selection</b>	Performance of the legitimate interest of the Company, satisfying the workforce need	Varied, in particular the name, date, place of birth, mother's name, address, qualification data, photo, telephone number, e-mail address of the natural person, the employer's memo made in respect of the applicant	Upon the request of the applicant, his/her data may be deleted from the database at any time. Automatic deletion at the end of the 5 <sup>th</sup> year calculated from the application.	The manager entitled to exercise employer's rights, the employees who complete employment-related tasks.
<b>Operation of camera</b>	Legitimate interest of	Image, behaviour	In the absence of statutory	Operating staff. IT

<b>surveillance system for the purpose of protection of human life, physical integrity, personal freedom, and trade secret, as well as for the purpose of property security</b>	the Employer/ voluntary consent of the visitor through implied consent		use, 3 working days	manager, the managing director of the employer and the upper management, as well as the workplace manager of the area subject to surveillance.
<b>Description and purpose of the data management</b>	<b>Legal basis of the data management</b>	<b>Scope of the data managed</b>	<b>Duration of the management</b>	<b>Who have access to the data</b>
<b>Management of the data of natural person partners, keeping records of buyers and suppliers, conclusion of contract, intention to conclude contract, performance of contract, maintaining business contact.</b>	Statutory data management for the purpose of performing contracts	Name, birth name, date of birth, mother's name, address, tax identification number, tax number, number of private entrepreneur or licensed traditional small-scale producer license, ID card number, address of registered seat or place of business, telephone number, e-mail address, website address, bank account number, customer number (client number, order number), online identifier.	5 years after the termination of the contract, erasure or de-anonymization of the data of the natural person partner upon his/her request	The employees of the data controller who complete tasks related to customer service, the employees of the data controller who complete accounting, taxation tasks.
<b>The contact data of the</b>	Statutory data	Name, telephone number	5 years after the termination	The employees of

<p><b>natural person representatives of the legal person clients, customers and suppliers: the purpose is the conclusion of the contract with the legal person partner of the data controller, intention to conclude contract, performance of contract, maintaining business contact.</b></p>	<p>management for the purpose of performing contracts</p>	<p>and e-mail address of the natural person concerned.</p>	<p>of the contract, erasure or de-anonymization of the data of the natural person partner upon his/her request</p>	<p>the data controller who complete tasks related to customer service, the employees of the data controller who complete accounting, taxation tasks.</p>
<p><b>Description and purpose of the data management</b></p>	<p><b>Legal basis of the data management</b></p>	<p><b>Scope of the data managed</b></p>	<p><b>Duration of the management</b></p>	<p><b>Who have access to the data</b></p>
<p><b>Maintaining contract related to the contract. The purpose is exercising the rights and obligations arising from the contract.</b></p>	<p>Statutory data management for the purpose of performing contracts, legitimate interest – assuming that the contact person has a legal relationship for employment with the contracting party, therefore this data management does not prejudice the right of the data subject.</p>	<p>Name, telephone number and e-mail address of the natural person.</p>	<p>5 years after the termination of the contract, erasure or de-anonymization of the data of the natural person partner upon his/her request</p>	<p>The employees of the data controller who complete tasks related to customer service, the employees of the data controller who complete accounting, taxation tasks.</p>

<b>Visitor data management on the website of the Company – cookie management. The purpose is ensuring the functional operation of the website (session/cookies, facilitating use, collection of information, analysis of website visit, development of the website and the services).</b>	Provision of information	None – there is no collection of information or website visit analyses on the website of the company	There is no data management and data retention function	No access
<b>Description and purpose of the data management</b>	<b>Legal basis of the data management</b>	<b>Scope of the data managed</b>	<b>Duration of the management</b>	<b>Who have access to the data</b>
<b>Contact through the website</b>	Consent of the data subject	Name, telephone number and e-mail address of the natural person.	Until the request for erasure of the data subject.	The employees of the data controller who complete tasks related to customer service.
<b>Facebook site: introduction, promotion of the company, recruitment.</b>	None	Data controller does not manage the published data of the visitors	There is no data management and data retention function, the Data Privacy and User Terms of Facebook are applicable to the visitors	No access
<b>Human resources,</b>	The enforcement of	In accordance with the	Until the 8th year following	The executive of the

<p><b>personnel records: the purpose is the conclusion, fulfilment or termination of employment relationship</b></p>	<p>the legitimate interests of the employer, employment contract</p>	<p>provisions of law and the internal policies</p>	<p>the termination of the employment, and without time limitation in respect of the rights and obligations related to the pension payment</p>	<p>Company, the person exercising employer's rights, the employees and data processors of the Company who complete employment-related tasks.</p>
<p><b>Data management by disbursement party: Fulfilment of the tax and contribution obligation specified by law (tax advance, determination of contribution, payroll, social security, pension administration)</b></p>	<p>Fulfilment of legal obligation</p>	<p>The personal data - specified by tax laws - of the employees, their relatives, employees, persons receiving other allowances, with whom the data controller has disbursement party relationship (Point 31. Section 7 of Act CL of 2017 on the Rules of Taxation (Rules of Taxation Act)).</p>	<p>Until the 8th year following the termination of the employment, and without time limitation in respect of the rights and obligations related to the pension payment</p>	<p>The employees and data processors of the Company who complete the taxation, book-keeping, payroll and the social security tasks of the Company.</p>