

# PRIVACY INFORMATION

This Privacy Information is available online at [www.primerate.hu](http://www.primerate.hu) under Data Management and can be downloaded as a PDF file from the website.

# INTRODUCTION

## THE DATA MANAGEMENT PRACTICE OF PRIME RATE KFT.

Prime Rate Kft. (1044 Budapest, Megyeri út 53; Company reg. no. 01-09-694453, tax number: 12602702-2-41), (hereinafter referred to as the "service provider" or Data Controller) agrees to be bound by the contents of this legal notice. It undertakes to ensure that all data management related to its activities complies with the requirements set out in this regulation and the applicable national legislation and the legal acts of the European Union.

Data privacy policies related to the data processing by Prime Rate Kft. are constantly available at [www.primerate.hu/adatvedelem](http://www.primerate.hu/adatvedelem).

Prime Rate Kft. reserves the right to change this information at any time. It will notify its customers and interested partners of any changes in a timely manner. If you have any questions about this Privacy Information, please write to us.

Prime Rate Kft. is committed to protecting the private data of its customers and partners and considers it crucial to respect its customers' right to informational self-determination. Prime Rate Kft. treats personal information confidentially and will take all security, technical and organizational measures to guarantee the security of such data.

Below, the data management practices of Prime Rate Kft. are described.

# DEFINITIONS

<b>Personal Data Breach</b>	any damage to data security resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or unauthorized access to personal data transmitted, stored or otherwise processed;
<b>Data Processor</b>	a legal entity that processes personal data for and on behalf of the Data Controller;
<b>Data Controller</b>	a legal entity that alone or with others determines the purposes and methods of handling personal data;
<b>Data subject</b>	an identified or identifiable natural person;
<b>European Economic Area (EEA)</b>	the economic territory comprised of the Member States of the European Union and of the European Free Trade Association (Iceland, Liechtenstein and Norway) (with the exception of Switzerland);
<b>Processing</b>	the sum of any automated or non-automated operation(s) carried out with regard to the personal data, i.e. collection, recording, organization, storage, conversion or modification, retrieval, insight, use, disclosure, transmission, dissemination or any other disclosure of personal data, harmonization or linking, locking, deletion, or destruction.
<b>GDPR</b>	Regulation 2016/679 of the European Parliament and of the Council (EU) on the protection of natural persons with regard to the processing of personal data and the free movement of such data and on repealing Regulation 95/46/EC (General Data Protection Regulation);
<b>Relevant Legislation</b>	applicable relevant legislation, in particular the GDPR;
<b>Approved Purpose</b>	the activity required to fulfil the purpose of the data management or determined in writing by the Data Controller from time to time;
<b>Approved Area</b>	defined, identified area(s) where the processing of Personal Data may take place;
<b>Keeping contact</b>	the communication options indicated in the Information

# DEFINITIONS

**Personal Data**

any information relating to an identified or identifiable natural person (hereinafter referred to as "the Data subject"); identifiable is a natural person whose identity can be determined on the basis of an identifier, e.g. such as a name, identification number, geographic data, an online ID or one or more factors related to physical, psychological, genetic, mental, economic, cultural or social identity;

**Services**

the services provided by the Data Controller resulting from its core activity;

# PRINCIPLES OF DATA MANAGEMENT

The data management related to the activity of Prime Rate Kft. is based on a voluntary contribution or a statutory mandate. In the case of data handling based on voluntary contributions, the data subjects may withdraw their consent at any stage during the processing of data.

In some cases, the management, storage, and transmission of a particular set of data is required by law, which is specifically notified to our partners.

We remind our customers providing data to Prime Rate Kft. that if they do not provide their own personal data, the person providing the data is obliged to obtain the consent of the data subject.

Our data management principles are in line with applicable data protection legislation, in particular the following:

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.);
- Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (EU) on the protection of natural persons with regard to the processing of personal data and the free movement of such data and on repealing Regulation 95/46/EC (General Data Protection Regulation, GDPR);
- Act V of 2013 on the Civil Code (Ptk.);
- Act C of 2000 on Accounting (Számv. tv.);
- Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Hpt.).
- Act CXCIX of 1995 on the management of name and address data for research and direct marketing purposes.

# THE PURPOSE, TITLE, DURATION, PERSONAL SCOPE OF DATA MANAGEMENT

## CUSTOMER DATA MANAGEMENT

Prime Rate Kft. manages and processes personal data in connection with its core activity and business. Subject to the principle of the requirements for the specified purpose, the personal data of the Data subjects will be treated only as specified in this Privacy Information, which the Data subject has accepted. Apart from fulfilling the services provided by Prime Rate Kft., the processing of personal data and the storage of the data is done to fulfil tax and accounting statutory obligations and to perform additional data management with regard to newsletter subscriptions.

### Data management for [www.primerate.hu](http://www.primerate.hu)

**The purpose of data management:** to distinguish or identify users who have registered to make an appointment, receive a quotation or a printing newsletter, to store the supplied data, and to prevent data loss.

**The legal basis for data management:** the voluntary contribution of the data subjects and the fulfilment of a legal obligation.

**The scope of managed data:** Name of Data subject, Company Name, E-mail Address, Phone Number, Postal Address

**Deadline for deletion of data:** for all data, eight years from the date of issue of the invoice for the service used pursuant to Section 169 (2) of the Accounting Act. In the event of a sign-up for newsletters, personal data will be stored until the Data subject withdraws their consent.

## OTHER WEBSITES OPERATED BY PRIME RATE KFT.

### Data Management for [www.bookstreet53.com](http://www.bookstreet53.com)

**The purpose of data management:** to identify the user concerned, to keep contact with the user, to register purchases by the user, to produce the products purchased by the user, to support delivery, to validate invoicing and payment, to exercise rights arising from the purchase, to fulfil the obligations.

**The legal basis for data management:** the voluntary consent of the data subjects.

**The scope of managed data:** Name of Data subject, E-mail Address, Date of Birth, Billing Address, Delivery Address, Digital file of ordered product

**Deadline for deletion of data:** for all data (except for the digital file), eight years from the date of issue of the invoice for the service used pursuant to Section 169 (2) of the Accounting Act. For the digital file related to the order after 1 year + 1 month.

**Data handling registration number:** NAIH-57822/2012

Visiting our websites is not subject to registration, but some of the services are only accessible to registered users. Only the Data subjects are responsible for the authenticity and truthfulness of their personal data and other data.

# THE PURPOSE, TITLE, DURATION, PERSONAL SCOPE OF DATA MANAGEMENT

## HANDLING OF COOKIES ON WEBSITES

For the purposes of customized service, the service provider puts a small data package, a so-called cookie on the user's computer and reads it back at a later visit. If the browser returns a previously saved cookie, the service operator handling the cookie can link the user's current visit with previous ones, but only for their own content.

**The purpose of data management:** to identify the user's current session, to store the data provided during the session, and to prevent data loss.

**The legal basis for data management:** the contribution of the Data subject.

**The scope of managed data:** identification number, date, time, and the previously visited page.

## PROPERTY PROTECTION

### Electronic surveillance system

On the premises and in the buildings owned by Prime Rate Kft., a surveillance and video recording system is in place. As part of this system, cameras equipped with infra technology have been installed that are capable of recording zoomable colour images even in the dark. The cameras are directed at the closed-off parking lot, sections between the building and the fence marking the property line, within the office building at the main entrance leading to reception, other entry points (warehouse door, employee entrance, emergency exits), the corridors in front of the offices, and the corridors and loading spaces of factory sites. The exact location of the cameras and the names of the areas kept under surveillance are contained in the annex to this information available at Prime Rate Kft's reception desk.

**The purpose of data management:** to operate an electronic surveillance and recording system for the protection of human life, physical integrity and property, to prevent and detect violations of law, and to catch perpetrators in the act as well as to prove violations and to enforce the fulfilment of obligations arising from contracts.

**The legal basis for data management:** for customers, the consent of the Data subject given by entering Prime Rate Kft.'s premises; for employees, see Section 11 of Act I of 2012 on the Labour Code (Mt.).

**The scope of managed data:** the photo of persons entering Prime Rate Kft's premises and other personal data recorded by the surveillance system.

**The duration of data management:** up to sixty days in the absence of use [Section 31 (4) point a) of the Act on the Protection of Persons and Property].

**Information on the storage of data:** the recordings are stored on servers at Prime Rate Kft's headquarters, protected by enhanced data security measures to ensure that no unauthorized person can view or copy the recordings.

**Access to the images:** only Prime Rate Kft.'s designated employee is entitled to view the current image of the cameras in order to achieve the data management objectives specified in this information. Only Prime Rate Kft.'s designated employee is entitled to view the recordings or transfer the recording onto a data carrier in order to achieve the data management objectives specified in this information.

# THE PURPOSE, TITLE, DURATION, PERSONAL SCOPE OF DATA MANAGEMENT

**Logging:** Prime Rate Kft. draws up minutes of inspection of the recorded images and transmission to a data carrier by indicating the name of the person carrying out the operation along with the reason for and the time of the inspection of the data.

**Rights of the Data subject:** the Data subject whose right or legitimate interest is affected by the recording of the image may request after certifying their right or legitimate interest that the data controller should not destroy or delete the recording until the court or the authorities are notified but for a maximum of 30 days. Also, the person shown in the recording may request that the data controller inform them in writing as to what can be seen on the recording concerned. The data subject can only receive a copy of a recording in which other people cannot be seen or are unrecognizable. If the above cannot be met, the data controller will make sure that the Data subject can view the recording showing them. The Data subject may request that the recording made of them be deleted, the data related to the recording be modified, or may object to data handling.

## OTHER FORMS OF DATA MANAGEMENT

### **Data management for marketing purposes**

Prime Rate Kft. performs data management for marketing purposes – which may include an e-mail sent electronically with an advertising message, a paper-based newsletter sent by post – only if the Data subject has expressly agreed to it and has signed up for the newsletter. In the event of a clear consent or subscription, Prime Rate Kft. may contact the Data subject with information on its services or related new messages until they withdraw their consent. Prime Rate Kft. does not send spam ad messages to the Data subject and they can unsubscribe free of charge from any newsletter (offers) without any justification, withdraw their data management consent without limitation by sending notification to Prime Rate Kft's address. In the event of withdrawal, Prime Rate Kft. shall delete all personal data of the Data subject from its register - including those needed for sending newsletters, offers, direct marketing messages - and may no longer contact them with marketing messages in the future.

### **Data management for technical purposes**

Prime Rate Kft's system automatically records the IP address of the user's computer, the start time of the visit, and in some cases – depending on the settings of the computer – the type of the browser and the operating system. The data thus recorded cannot be linked to other personal data. The data is managed solely for statistical purposes.

### **Notification obligation:**

In the event of the occurrence of a probably high-risk Personal Data Breach, Prime Rate Kft. shall inform the Data subject without undue delay and the Supervisory Authority within the time limit specified in the GDPR Regulation.

### **Access to personal data:**

The data provided may only be accessed by the Data Controller or by a staff member employed by Prime Rate Kft. in connection with his or her job, for example the following people: IT administrator, sales



# THE PURPOSE, TITLE, DURATION, PERSONAL SCOPE OF DATA MANAGEMENT

representatives, product manager, financial administrator, a staff member involved in the production of products containing personal data.

## **Data transfer:**

The Data Controller may not transfer personal data relating to the use of the service to third parties, but it may be contacted by the court, the prosecutor's office, the investigative authority, the administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information or other bodies on the basis of statutory authorization to supply information, disclose or hand over data. On the basis of the inquiry from these bodies, subject to the exact purpose and scope of the data specified by the requesting entity, the Data Controller will provide the personal data essentially necessary for the purpose of the request.

**Information regarding data management not listed herein is provided when data is recorded.**

# DATA PROTECTION AND DATA STORAGE

## Protection and storage of data

The computer systems and other data retention locations of Prime Rate Kft. are located at its headquarters and sites.

Prime Rate Kft. chooses and operates the IT devices used to handle the personal data while providing the service in such a way that:

- i. the handled data should be accessible to the authorized persons (availability);
- ii. the handled data should be credible and authentic (credibility of data management);
- iii. the unaltered character of the handled data could be verified (data integrity);
- iv. the handled data should be protected against unauthorized access (data confidentiality). Prime Rate Kft. takes appropriate measures to protect the data, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction or accidental loss, damage as well as from becoming unavailable due to a change in the applied technology. To protect the data files managed electronically in its various registers, Prime Rate Kft. uses an appropriate technical solution to make sure that the stored data, except for the cases permitted by law, cannot directly be linked with each other or assigned to the Data subject. With regard to the current state of technology, Prime Rate Kft. takes technical and organizational measures to ensure the protection of the safety of data handling to provide a level of protection that matches the risks entailed with data handling.

During data management, Prime Rate Kft. preserves:

- confidentiality: it protects the information so that it can only be accessed by persons who are entitled to do so;
- integrity: it protects the accuracy and completeness of the information and the method of processing;
- availability: it makes sure that authorized users should really be able to access the desired information, when needed, and the related tools should be available.

To ensure the security of data management, Prime Rate Kft. takes appropriate technical and organisational measures, taking risks into account, to protect against computer-assisted fraud, espionage, sabotage, vandalism, fire and flood as well as from computer viruses, computer intrusions and attacks resulting in refusal to perform service. We inform users that regardless of the protocol (e-mail, web, ftp, etc.), electronic messages transmitted on the Internet are vulnerable to network threats that may lead to unfair practices, challenging the contract, or the disclosure or modification of information. The data controller shall take all possible precautions to protect from such threats. It monitors the systems in order to record any security deviation and to provide proof of all security events.

System monitoring allows checking the effectiveness of the applied security measures as well.

# RIGHTS OF THE DATA SUBJECTS

## Rights

The data subjects may request information regarding the handling of their personal data and request that their personal data be rectified and, except for obligatory data management, deleted, or withdrawn, or that they may exercise their right to data portability and objection in the manner indicated when the data is recorded and by contacting the data controller in one of the ways listed above.

### **Right to information:**

Prime Rate Kft. shall take appropriate measures to ensure that all information relating to the processing of personal data referred to in Articles 13 and 14 and Articles 15–22 and 34 of the GDPR is provided to the data subjects in a concise, transparent, comprehensible and easily accessible form, in a clear and unambiguous manner.

The right to information can be exercised in writing through the contacts listed in Introduction or in the Contact section. At the request of the data subject and after verifying his or her identity, information may be given orally as well.

### **The right of the data subject to access:**

The data subject is entitled to receive feedback from the data controller about whether their personal data is being processed and, if such processing is in progress, they have the right to access personal data and the following information.

The purposes of data management. Categories of the personal data concerned. The recipients or the categories of recipients who or which personal data has been or will be communicated to, including in particular third country addressees or international organizations. Planned duration of storage of personal data. The right to correction, deletion or limitation of data management and the right to protest. The right to file a complaint addressed to the supervisory authority. Information on data sources. The fact of automated decision making, including profiling and the understandable information on the logic used and regarding the significance of such data management and the expected consequences for the data subject. If personal data is transferred to a third-party country or to an international organization, the data subject shall have the right to be informed of the appropriate guarantees regarding data transfer.

Prime Rate Kft. makes a copy of the personal data subject to data management available to the data subject. For additional copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs. At the request of the data subject, Prime Rate Kft. may provide the information in electronic form. The data controller shall provide the requested information no later than within 30 days of submitting the request.

### **Right to correction:**

The data subject may request correction of inaccurate personal data managed by Prime Rate Kft. and completion of incomplete data.

### **Right to deletion:**

If one of the following reasons exists, the data subject may request that Prime Rate Kft. delete the personal data relating to him or her without undue delay:

- the personal data is no longer required for the purpose which they have been collected or otherwise managed for;

# RIGHTS OF THE DATA SUBJECTS

- the data subject withdraws his or her consent underlying data management and it has no other legal basis;
- the data subject objects to data management and no priority legitimate reason for data management exists;
- the personal data has been managed unlawfully;
- the personal data has to be deleted to comply with a legal obligation applicable to the data controller by a legal regulation of the EU or the Member State;
- the personal data is collected in connection with the provision of information society services.

The deletion of data may not be initiated if the management of the data is necessary: to exercise the right to freedom of expression and to seek information; to comply with an obligation regarding the management of personal data applicable to the data controller by a legal regulation of the EU or the Member State, or to complete a task to be carried out in the public interest or to exercise a public authority conferred to the data controller; for a purpose concerning public health or for the purposes of archival, scientific and historical research or for statistical purposes; or to submit, enforce or protect legal claims.

## **Right to limit data management:**

At the request of the data subject, Prime Rate Kft. will limit the management of data if one of the following conditions is met:

- the data subject disputes the accuracy of the personal data; in this case, the restriction concerns the period of time that allows the accuracy of the personal data to be verified;
- data management is illegal and the data subject is opposed to the deletion of the data and instead asks for its use to be restricted;
- the data controller no longer needs the personal data for the purposes of data management but the data subject needs it to submit, enforce, or protect legal claims; or
- the data subject objected to data management; in this case, the restriction applies to the period during which it is established that the data controller's legitimate reasons have priority over those of the data subject.

If data management is limited, the personal data may be managed, except for storage, only with data subject's consent or in order to submit, enforce or protect legal claims or to protect the rights of any other natural or legal person, or in the public interest of the Union or of a Member State.

Prime Rate Kft. informs the data subject in advance of the removal of the limitation of data management.

## **Right to data portability:**

The data subject shall have the right to receive the personal data provided to the data controller in a categorized, widely used machine-readable format and transmit such data to another data controller.

## **Right to protest:**

For a reason related to his or her personal situation, the data subject shall have the right to object at any time to the management of data necessary for the execution of a task performed in the public interest or to exercise a public authority conferred onto the data controller or for the enforcement of the legitimate interests of the data controller or a third party, including profiling pursuant to those provisions. In the event of a protest, the data controller may no longer manage the personal data unless it is justified by

# RIGHTS OF THE DATA SUBJECTS

compelling legitimate reasons that have priority over the interests, rights and freedoms of the data subject, or which relate to the submission, enforcement or protection of legal claims.

If the personal data is managed for direct marketing purposes, the data subject is entitled to object at any time to the management of personal data for that purpose, including profiling, if it is related to direct marketing. In the event of a protest against the management of personal data for direct marketing purposes, the data cannot be managed for this purpose.

Automated decision-making in individual cases, including profiling:

The data subject shall be entitled to be excluded from the scope of a decision based exclusively on automated data management, including profiling, which would have a legal effect on or would otherwise significantly affect him or her. The above right does not apply if the data management

- is necessary for the conclusion or performance of a contract between the data subject and the data controller;
- is made possible by a legal provision of the EU or the Member State applicable to the data controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- is based on the express consent of the data subject.

## **Right of withdrawal:**

The data subject shall be entitled to withdraw his or her consent at any time. Withdrawal of such consent does not affect the lawfulness of the data management based on consent prior to such withdrawal.

## **Procedural provisions:**

The data controller shall inform the data subject without undue delay, but in any way within one month from the receipt of the request, of the measures taken in response to the request pursuant to Articles 15–22 of the GDPR. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by two additional months. The data controller shall inform the data subject of the extension of the deadline by indicating the reasons for the delay within one month of receipt of the request. If the data subject has submitted the request electronically, the information will be provided electronically, unless otherwise requested by the data subject. If the data controller fails to take measures in response to his request, it shall inform the data subject of the reasons for such failure without delay but no later than within one month of receipt of the request and of the fact that the data subject may file a complaint with a supervisory authority and exercise his or her right to judicial remedy.

Prime Rate Kft. will provide the requested information free of charge. If the data subject's request is clearly unjustified or excessive, due to its particularly repetitive nature, the data controller may, taking into account the administrative costs incurred by providing the requested information or taking the requested measure, charge a reasonable fee or may refuse to take action on the basis of the request. The data controller informs all recipients of any rectification, deletion or limited data management who or which it has disclosed the personal data to, unless this proves impossible or requires disproportionate effort. At the request of the data subject, the data controller shall inform the data subject of such addressees. The data controller makes a copy of the personal data subject to data management available to the data subject. For additional copies requested by the data subject, the data controller may charge a reasonable fee based on

# RIGHTS OF THE DATA SUBJECTS

administrative costs. If the data subject has submitted the request electronically, the information will be provided in electronic format, unless otherwise requested by the data subject.

## **Compensation and tort:**

Any person who has suffered material or non-material damage as a result of a violation of the Data Protection Regulation is entitled to compensation from the data controller or data processor for the damage suffered. The data processor shall only be held liable for the damage caused by data management if it has not complied with the statutory obligations specifically imposed on data processors or if it has disregarded or has acted contrary to the data controller's legitimate instructions. If several data controllers or several data processors or both the data controller and the data processor are involved in the same data management and are responsible for the damage caused by the data management, each data controller or data processor is jointly and severally liable for the total damage.

The data controller or the data processor shall be exempt from liability if it proves that it is not liable in any way for the event giving rise to the damage.

## **Complaint submitted to the Data Protection Officer:**

If you have a problem with the data management by Prime Rate Kft., please contact the Data Protection Officer using any of the contact details provided under Contact.

## **Access to justice:**

The data subject may sue the data controller in court if his or her rights have been violated. The court shall give priority to the case.

## **Proceedings before the Data Protection Authority:**

Complaints can be filed with the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság

Seat: H-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](mailto:ugyfelszolgalat@naih.hu)

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

# CONTACT

## CONTACT DETAILS

Regarding the information contained herein, you can send a report to the following places and in the following ways:

By letter: Prime Rate Kft. H-1044 Budapest, Megyeri út 53., Hungary,

By e-mail: [adatkezeles@primerate.hu](mailto:adatkezeles@primerate.hu)

By phone: (+36 1) 231 4060

In person: at Prime Rate Kft.'s seat (H-1044 Budapest, Megyeri út 53.)

Prime Rate Kft. deletes all emails received together with the sender's name, email address, date, time, and other personal data provided in the message within five years of the date when the data was supplied.

## COMPANY DATA

**Prime Rate Szolgáltató és Kereskedelmi Kft.**

**Székhely: 1044 Budapest, Megyeri út 53.**

**Tax number:** 12602702-2-41

**Company registration no.:** 01-09-694453

**Phone:** (+36 1) 231 4060

[www.primerate.hu](http://www.primerate.hu)

## AMENDMENTS TO THE PRIVACY INFORMATION

Prime Rate Kft. reserves the right to amend this Privacy Information by its unilateral decision at any time.