PRIVACY NOTICE

Last amended: [11 September 2019]

MULTICOM Contact Kft. (hereinafter: MULTICOM) processes information qualifying as "personal data" under Article 4(1) of Regulation (EU) 2016/679, the General Data Protection Regulation ("GDPR"), in relation to third parties, contact persons of its contractual partners and other persons (together: "data subject(s)"). Through this Privacy Notice ("Notice"), MULTICOM informs data subjects about its practices regarding the processing of personal data and about the manner and possibilities for exercising their rights.

MULTICOM reserves the right to amend this Notice unilaterally with effect after the amendment, subject to the restrictions set out in applicable laws and, where necessary, by providing data subjects with appropriate prior notice in due time. This Notice may be amended in particular where required by changes in legislation, data protection authority practice, business or employee needs, a new activity involving the processing of personal data, a newly identified security risk, or feedback from data subjects. In communications concerning this Notice or data protection matters, and otherwise in the course of its relationship with data subjects, MULTICOM may use the contact details available to it for the purposes of making and maintaining contact. Upon request, MULTICOM may, for example, send the data subject a copy of the Privacy Notice currently in force or confirm that the data subject has been informed of the Notice.

In certain specific cases, additional data protection terms may also apply, about which data subjects will receive separate information. Examples include the notice concerning the operation of electronic surveillance systems (cameras), the notice concerning the access control system used in MULTICOM's offices, and the notice concerning cookies used by MULTICOM on its websites.

With regard to contracts entered into with its clients as data controllers that also concern data processing, MULTICOM acts as a data processor.

By providing personal data, the data subject warrants that (i) the data relate exclusively to his or her own personal data; or (ii) he or she has appropriate and informed consent or another legal basis for providing the personal data (for example, when providing the data of third parties). If MULTICOM becomes aware that a data subject's data have been disclosed without his or her consent or another appropriate legal basis, MULTICOM may delete such data without delay. MULTICOM shall not be liable for any damage, loss or harm resulting from a breach of the above obligation by the data subject.

MULTICOM may also receive data relating to data subjects from external companies, e.g. recruitment agencies and headhunters. Processing carried out by an external company is governed by that company's own data processing terms, over which MULTICOM has no control. Where a processing purpose is necessary for the enforcement of the legitimate interests of MULTICOM or a third party, MULTICOM will make available, upon request submitted to any of the above contact details, the balancing test used to establish the legitimate interest.

MULTICOM expressly draws data subjects' attention to the fact that they have the right, on grounds relating to their particular situation, to object at any time to the processing of their personal data based on legitimate interests. In such case, MULTICOM will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or which are related to the establishment, exercise or defence of legal claims.

Where this Notice defines the duration of processing by reference to the limitation period for enforcing a claim, an act interrupting the limitation period extends the duration of processing until the new date on which the limitation period expires (Act V of 2013 on the Civil Code – "Civil Code" – Section 6:25(2)). Where the limitation period is suspended, the claim may be enforced within one year from the cessation of the obstacle – or within three months in the case of a limitation period of one year or less – even if the limitation period has already expired or less than the above period remains (Civil Code Section 6:24(2)).

The 8-year data retention period specified in Act C of 2000 on Accounting ("Accounting Act") is calculated from the point when, in the relevant year, an accounting entry relating to the data arose or the financial statements/accounting relied on the data in any way. In practice, if the data appear in a contract under which several performances take place (e.g. several consulting services are provided under one contract), the 8 years must be calculated separately from each performance, because a separate invoice is issued for each performance and the relevant transaction is recorded on that basis. If the data appear in a contract concerning, for example, the sale of an item (delivery takes place and the contract terminates upon performance), the transaction is recorded in the relevant year on the basis of the contract and invoice, and the 8-year period starts from that year.

1. Name, address and electronic contact details of the Data Controller:

1.1. Name: MULTICOM Contact Kft. – Dénes Kovácsházy, Managing Director
1.2. Address: 1121 Budapest, Zsigmondy Vilmos utca 8/B, Hungary
1.3. Electronic contact: info@multicom.hu
1.4. Contact: +36 (1) 310-7145
1.5. Name of Data Protection Officer: Attila Rosta

1.6. Contact details of Data Protection Officer: 1121 Budapest, Zsigmondy Vilmos utca 8/B / info@multicom.hu / +36 (1) 310-7145

1.7. The current version of this Notice is available and can be downloaded from MULTICOM's website (www.multicom.hu/multicom_adatvedelem.pdf).

2. Data processing activities

2.1 Purpose of processing: **maintaining contact and communication with data subjects.**

Legal basis for processing: Article 6(1)(f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by MULTICOM). Legitimate interest: handling enquiries received by MULTICOM and answering questions addressed to MULTICOM.

Categories of data processed: name of the data subject, company name, position, postal code, city, address, telephone number, e-mail address, billing data (tax number or tax identification number of the payer and bank account number), personal data concerned by the communication/enquiry, and records of actions taken in connection with the communication/enquiry.

Duration of processing: 5 years from the date the enquiry is answered (Civil Code Section 6:22(1) – unless otherwise provided by the Civil Code, claims become time-barred after 5 years).

2.2 Purpose of processing: **handling requests for quotations and processing the data of contact persons of contractual partners and/or persons involved in performance / verification of performance for the purpose of performing (day-to-day implementation of) the contract.**

Categories of data processed: company name, name, telephone number, e-mail address, message, personal data concerned by the request for quotation, and records of actions taken in connection with the quotation. Processing also includes, for example, processing the postal addresses of contact persons, instructions from contact persons for making payments, or sending official notices using contact details and information relating to contractual obligations to be performed. Depending on whether the contract is concluded with the data subject (e.g. sole traders) or with another undertaking, and whether the quotation is requested beforehand: Article 6(1)(b) GDPR – performance (implementation) of a contract concluded directly with the data subject / Article 6(1)(f) GDPR – legitimate interests of MULTICOM and the contracting undertaking: performance of contractual obligations, exercise of rights, and coordination of the parties' economic cooperation. Providing personal data is a requirement for the quotation / contract; without the personal data, MULTICOM cannot process the request for quotation or, where applicable, conclude and perform the related contract.

Duration of processing:

5 years from the termination of the contractual relationship (Civil Code Section 6:22(1) – unless otherwise provided by the Civil Code, claims become time-barred after 5 years).

For the fulfilment of tax obligations: the retention period is 5 years from the last day of the calendar year in which a tax return, data report or notification should have been submitted, or, in the absence of such return, data report or notification, the tax should have been paid (Act CL of 2017 on the Rules of Taxation – "Taxation Act" – Sections 78(3), 202(1)).

For accounting documents: the retention period is 8 years (Accounting Act Sections 168–169). In practice, this applies where the data form part of documents supporting the accounting records, for example documents relating to the conclusion of a contract between MULTICOM and the partner (e.g. an order) or an issued invoice.

2.3 Purpose of processing: **processing the personal data of applicants for positions at MULTICOM for the purpose of filling positions advertised by MULTICOM and applied for by candidates (recruitment), and documenting the selection process.**

Legal basis for processing:

Article 6(1)(b) GDPR (processing is necessary in order to take steps at the request of the data subject prior to entering into an employment contract and to assess the application).

The information concerning processing applies whenever an applicant submits or delivers a job application to MULTICOM in any form (including in particular: sending an application by e-mail, personally delivering a CV at MULTICOM's registered office, or applying for an advertised position through the channel specified in the advertisement).

Without the personal data, the job application cannot be assessed.

For applications to positions requiring the establishment of an employment relationship, Section 10(1) of Act I of 2012 on the Labour Code must be taken into account, according to which data relevant to the establishment of employment may be requested from the employee even before the employment relationship is established, and MULTICOM, as the prospective employer, may also request the presentation of documents relevant to the establishment of employment.

In the event of a successful selection where a recruitment agency is used, MULTICOM informs the recruitment agency of the hiring and the applicant's starting salary in accordance with the agency's data processing terms, so

that the commission due for successful recruitment can be calculated. The legal basis for the data transfer in this case is Article 6(1)(f) GDPR (the legitimate interests of MULTICOM and the recruitment agency).

The legal basis for processing the data of a reference person is Article 6(1)(f) GDPR (the legitimate interests of MULTICOM and the applicant).

Categories of data processed:

Applicants' names; contact details (address, telephone number, e-mail address and, where applicable, LinkedIn or other social media contact details and professional website address); the content of the CV and cover letter; profile picture (photo) attached to the CV; foreign-language skills; data relating to previous work experience, workplace(s), qualifications, abilities and studies; preferred professional field; references; and, where applicable, expected monthly salary. CVs and applications may also include personal data voluntarily provided by applicants themselves, such as place and date of birth, mother's name and nationality.

MULTICOM receives these data either directly from the applicant or from a third party forwarding the applicant's data (for example, recruitment agencies). In the latter case, the third party's data processing terms may also apply. Processing also covers personal data discussed during any job interview in connection with clarifying the content of the submitted application, the applicant's professional expectations and requirements, and any professional questions, tasks and competencies.

MULTICOM also prepares internal notes in connection with applications concerning the applicant's suitability and the criteria used to assess it.

The applicant may also provide the name, position and contact details of reference persons connected to a former or current workplace if the applicant considers that the person concerned (typically a former professional supervisor or colleague) can provide credible information about the applicant's professional experience and expertise. Providing such data and naming a reference person is optional, and the applicant will not be disadvantaged by MULTICOM if no reference person is provided. By naming a reference person, the applicant declares that he or she has an appropriate legal basis for transferring the reference person's personal data and that doing so does not infringe the reference person's rights.

If MULTICOM contacts a reference person, it may request information only in relation to data relevant to the position applied for and concerning the applicant's professional experience and expertise; no other data may be recorded.

Duration of processing:

For the purpose of any possible claim by the applicant against MULTICOM in connection with the job application, or any court or authority proceedings initiated, the retention period is 5 years after completion of the selection procedure pursuant to Civil Code Section 6:22. This is the period during which a claim relating to the selection procedure may be enforced, for example by invoking the prohibition of discrimination; it may also be justified for MULTICOM to keep an internal record during this period that a person has previously applied for a position, for the assessment of future job applications.

If the applicant withdraws the application through any of MULTICOM's contact channels before completion of the selection process, MULTICOM will delete the applicant's data. MULTICOM considers withdrawal of the application to mean that the applicant does not wish to assert claims in connection with the application and does not wish to enter into a contract with MULTICOM.

2.4 **Retention of the applicant's CV and other application materials (for example, cover letter), the results of suitability assessments, and notes made by the Company during the interview for the purpose of allowing the Company to contact the applicant directly with a job offer in the future (for example, in the event of a later vacancy).**

Legal basis for processing: Article 6(1)(a) GDPR (voluntary consent). After completion of the selection process, or even in the absence of an advertised position or vacancy, MULTICOM may ask the applicant to consent to the further retention of the application materials so that the applicant may be contacted in the future with a possible job offer (for example, where there is currently no vacancy in the field applied for, but one is expected later). The applicant has the right to withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Consent is voluntary; however, without consent, MULTICOM cannot directly contact the applicant concerned with a future job offer.

Categories of data processed: the personal data originally provided by the applicant, the result of any suitability assessment carried out by MULTICOM, and notes made by MULTICOM about the applicant during the interview.

Duration of processing: until withdrawal of the applicant's consent or, in the absence of withdrawal, for 2 years after completion of the selection process or after the job application was sent/delivered to the Company. MULTICOM considers this to be the period during which the data necessary for the purpose of processing may remain up to date and accurate. For example, an applicant may not have sufficient experience at the time of application but may later become suitable for a future position, or the position applied for may become vacant again. The applicant may request deletion of his or her data at any time. MULTICOM considers such a request to mean that the applicant does not wish to assert claims in connection with MULTICOM's retention of the application materials.

Purpose of processing

1.8. In the case of data that the User is required to provide: identification of the User's entitlement, prevention of misuse, facilitating contact by MULTICOM and the provision of the Service, market research, direct marketing activities and business development for MULTICOM's own purposes, and, where the User has given prior express consent.

1.9. The Data Controller makes the data available for the purposes indicated in Section 6.1. Personal data made available to MULTICOM in an audio recording and during a telephone conversation may be processed and transferred to a third party only on the basis of, and within the scope of, the User's consent. In the event of a data transfer, MULTICOM must inform the User of the name and contact details of the third party, where further information about processing may be obtained, where applicable the fact that a data processor is used, and the available remedies. The provisions of Sections 8–13 of this policy shall apply accordingly to remedies relating to audio recording and data transfer.

3. Data protection rights of data subjects and available remedies

3.1 Data protection rights and remedies

The data protection rights of data subjects and the available remedies are set out in detail in the relevant provisions of the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82). The summary below contains the most important provisions, and MULTICOM accordingly provides data subjects with information about their rights and remedies relating to processing.

Information must be provided in writing or by other means, including, where appropriate, by electronic means. At the request of the data subject, information may also be provided orally, provided that the identity of the data subject has been verified by other means.

MULTICOM shall inform the data subject without undue delay and in any event within one month of receipt of a request relating to the exercise of the data subject's rights (see Articles 15–22 GDPR) of the action taken on the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months. MULTICOM 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 submits the request electronically, the information shall, where possible, be provided electronically unless otherwise requested by the data subject.

If MULTICOM does not take action on the data subject's request, it 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 of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

3.2 Right of access by the data subject

(1) The data subject has the right to obtain confirmation from MULTICOM 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 the following information:

a) the purposes of the processing;

b) the categories of personal data concerned;

c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

e) the existence of the right to request from MULTICOM rectification or erasure of personal data or restriction of processing concerning the data subject, and to object to such processing;

f) the right to lodge a complaint with a supervisory authority; and

g) where the personal data are not collected from the data subject, any available information as to their source.

(2) Where personal data are transferred to a third country, the data subject has the right to be informed of the appropriate safeguards relating to the transfer.

(3) MULTICOM shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, MULTICOM may charge a reasonable fee based on administrative costs. Where the data subject makes the request electronically, the information shall be provided in a commonly used electronic form, unless otherwise requested by the data subject.

3.3 Right to rectification

The data subject has the right to obtain from MULTICOM without undue delay the rectification of inaccurate personal data concerning him or her. The data subject also has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3.4 Right to erasure (“right to be forgotten”)

(1) The data subject has the right to obtain from MULTICOM the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b) the data subject withdraws the consent on which the processing is based and there is no other legal ground for the processing;

c) the data subject objects to the processing and, where applicable, there are no overriding legitimate grounds for the processing;

d) the personal data have been unlawfully processed;

e) the personal data have to be erased for compliance with a legal obligation under Union or Member State law to which MULTICOM is subject; or

f) the personal data have been collected in relation to the offer of information society services.

(2) Where MULTICOM has made the personal data public and is obliged pursuant to the above to erase them, MULTICOM, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers processing the personal data that the data subject has requested the erasure of any links to, or copies or replications of, those personal data.

(3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary, among other things:

a) for exercising the right of freedom of expression and information;

b) for compliance with a legal obligation under Union or Member State law to which MULTICOM is subject and which requires the processing of personal data;

c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, insofar as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

d) for the establishment, exercise or defence of legal claims.

3.5 Right to restriction of processing

(1) The data subject has the right to obtain from MULTICOM restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, for a period enabling MULTICOM to verify the accuracy of the personal data;

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) MULTICOM no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or

d) the data subject has objected to processing, pending verification whether MULTICOM’s legitimate grounds override those of the data subject.

(2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with the data subject’s consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

(3) MULTICOM shall inform the data subject who has obtained restriction of processing pursuant to the above before the restriction of processing is lifted.

3.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing

MULTICOM shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. MULTICOM shall inform the data subject about those recipients if the data subject requests it.

3.7 Right to data portability

(1) The data subject has the right to receive the personal data concerning him or her, which he or she has provided to MULTICOM, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from MULTICOM, where:

a) the processing is based on consent or on a contract; and

b) the processing is carried out by automated means.

(2) In exercising the right to data portability under paragraph (1), the data subject has the right to have the personal data transmitted directly from one controller (including MULTICOM) to another, where technically feasible.

(3) The exercise of the above right shall be without prejudice to the provisions concerning the right to erasure ("right to be forgotten"), and shall not adversely affect the rights and freedoms of others.

3.8 Right to object

(1) The data subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her which is based on legitimate interests. MULTICOM shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or which are related to the establishment, exercise or defence of legal claims.

(2) Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning him or her for such marketing, including profiling to the extent that it is related to such direct marketing.

(3) Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

(4) In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise the right to object by automated means using technical specifications.

(5) Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, has the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

3.9 Right to lodge a complaint with a supervisory authority

The data subject has 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 GDPR. In Hungary, the competent supervisory authority is the Hungarian National Authority for Data Protection and Freedom of Information (website: http://naih.hu/; address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; postal address: 1530 Budapest, Pf. 5; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

3.10 Right to an effective judicial remedy against a supervisory authority

(1) The data subject has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him or her.

(2) The data subject has the right to an effective judicial remedy where the competent 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.

(3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

3.11 Right to an effective judicial remedy against MULTICOM or the data processor

(1) Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, the data subject has the right to an effective judicial remedy where he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of personal data not in compliance with the GDPR.

(2) Proceedings against MULTICOM or the data processor shall be brought before the courts of the Member State where MULTICOM or the data processor has an establishment. Such proceedings may also be brought before the courts of the Member State where the data subject has his or her habitual residence. In Hungary, such proceedings fall within the jurisdiction of the regional courts. The data subject may, at his or her choice, also bring the action before the regional court having jurisdiction according to his or her place of residence or stay. Information on the jurisdiction and contact details of the courts (regional courts) is available at www.birosag.hu.