



Data Processing Regulation

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A-LAP FÉMIPARI ÉS KERESKEDELMI KFT.

1 Purpose of this Data Processing Regulation

A-Lap Fémipari és Kereskedelmi Kft. (Tápiószecső Sági Rd 1. 2251 Hungary, hereinafter referred to as, service provider, data controller) as data controller accepts the content of this legal notice as compulsory. The data controller assumes obligation to comply with the requirements defined in this regulation, in the national legal regulations in effect as well as in the legal acts of the European Union.

The data protection policy regarding the data processing activity of A-Lap Fémipari és Kereskedelmi Kft. is available on the following website: www.A-Lap/adatvedelem.

A-Lap Fémipari és Kereskedelmi Kft. reserves the right to change this regulation at any time. Of course, it shall inform its partners about such changes in a timely manner.

In case of any questions in connection with this notice, please contact us and our colleague will help you.

A-Lap Fémipari és Kereskedelmi Kft. is committed to protecting the personal data of its clients and partners, and considers the right of its clients to informational self-determination as a priority. A-Lap Fémipari és Kereskedelmi Kft. keeps personal data confidential, and takes all the necessary security, technical and organizational measures to guarantee the security of data.

Below A-Lap Fémipari és Kereskedelmi Kft. describes its data processing policy.

2. Data of the Data Controller

If you wish to contact our company, you can do it on info@a-lapkft.hu.

A-Lap Fémipari és Kereskedelmi Kft. will delete all emails received along with all personal data within a maximum of 5 years after the provision of information.

Name:	A-Lap Fémipari és Kereskedelmi Kft.
Registered office:	Tápiószecső, Sági Rd. 1, 2251 Hungary
Incorporation No.:	13-09-065396
Tax Registration No.:	10667152-2-13
Phone:	+36 (29) 448-120; +36 (29) 447-652
Email:	info@a-lapkft.hu

2.1 Data Protection Officer:

Data Protection Officer of A-lap kft.:

name:	Anita Urbán
phone:	+36 30 540 8676
email:	urban.anita@a-lapkft.hu

3 The Scope of the Processed Personal Data

3.1 Personal Data to be Provided During the Course of Business

Essential data required to contact:

- name;
- phone;
- email;
- address

A-lap Kft. does not require any special personal data from its clients.



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3.2 Technical Data

A-Lap Fémipari és Kereskedelmi Kft. shall select and manage administrative and IT tools used for processing personal data during service provision to meet the following requirements:

- the processed data is available to the authorized persons (availability);
- authenticity and authentication of the processed data is ensured (authenticity of data procession);
- the integrity of the processed data is verified (data integrity);
- the processed data is protected against unauthorized access (data confidentiality).

A-Lap Fémipari és Kereskedelmi Kft. shall take the necessary measures to protect data against unauthorized access, change, transmission, disclosure, deletion or destruction, as well as accidental destruction.

A-Lap Fémipari és Kereskedelmi Kft. shall take the necessary technical and organizational measures to ensure the security of data processing, and provides appropriate protection against all the possible risks emerging during data processing.

In the course of data processing A-Lap Fémipari és Kereskedelmi Kft.

- ensures confidentiality: it protects information against unauthorized access;
- ensures integrity: it protects the accuracy and completeness of the information and processing method;
- ensures availability: it ensures that information is accessible and tools are available in case the authorized person needs it.

4 Intended Use and Retention of Processed Data:

Name of the data processing activity:	Method:	Legal ground:	Retention time:
Bid price	email, phone	customer contact	3 years
Counselling	email, phone	counselling contact	5 years
Request for quotation	email, phone	procurement	3 years
Account and accounts receivable management	paper-based	provision	8 years
Contracting	paper-based	customer contact	5 years
Enforcement of contractual claims	paper-based	provision	5 years
Sales offer	email, phone	marketing	2 years

5. The Purpose, Method and Legal Ground of Data Processing

5.1 General Data Protection Regulation

The data processing activity of A-Lap Fémipari és Kereskedelmi Kft. is based on voluntary consent as well as on legal authorization. In the case of data processing based on voluntary consent, the data subjects shall have the right to withdraw this consent at any time in the course of data processing. In some cases, the processing, storing and transmission of a particular set of data is mandatory by legal provisions about which we inform our clients.

Please note, that in the case of providing personal information to A-Lap Fémipari és Kereskedelmi Kft. on behalf of another person, the data provider is obliged to obtain the consent of the data subject.

The data processing principles are in compliance with the legal regulations in effect regarding data protection, with special regard to the following:

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act");



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- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (General Data Protection Regulation, GDPR);
- Act V of 2013 on the Civil Code;
- Act C of 2000 on Accounting ("Accounting Act");
- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing ("Anti-Money Laundering Act");
- Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises ("Financial Enterprises Act").

6 Physical Storage of the Data

Your personal data (namely any data that may be associated with your person) can be transferred to us as follows: on the one hand by documents stored at the registered office of the company, accessible only for users and created in connection with maintaining the customer relationship, on the other hand you can also provide us with your name, contact information or any other data when you wish to contact us on the website. These data are recorded electronically, and the scope of the users is limited to the data controllers specified in this regulation.

Data to be recorded technically during system operation:

- name of the subject data;
- email address;
- phone;
- name of the company he or she represents;
- the private entrepreneur's bank account number.

Data are recorded electronically. Data created during paper-based, usual course of business are stored for a period of time specified in the relevant legal provisions. These data cannot be linked to any other personal user data except in legally binding cases. These data are only accessible to the following persons: János Urbán, Anita Urbán, Anikó Csáki, Szilvia Pap, Krisztina Sinkóné Szűcs, Csaba Gulyás és Tamás Nagy.

7 Data Transmission, Data Processing and the Persons with Access to the Data

Data processing and accessibility are carried out within the framework of A-Lap Fémipari és Kereskedelmi Kft., and data can be disclosed to a third party only in a legally authorized form or with previous consent. In this case we require a special power of attorney from the data subjects.

8 The Data Subject's Rights and Opportunities for Enforcement

The data subject has the right to obtain information about the processing of his or her personal data and also to request the rectification or erasure of their personal data with the exception of compulsory data processing, as well as the data subject is entitled to exercise their right to transfer data and to object as indicated in the course of data entry and on the data controller's aforementioned contact details.

8.1 Right to Information

A-Lap Fémipari és Kereskedelmi Kft. shall take the necessary measures to provide any information referred to in Articles 13 and 14 of GDPR and any communication under in Articles 15-22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.



8.2 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 the following information:

- the purposes of data processing;
 - the categories of the personal data concerned;
 - 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 organizations;
 - the envisaged period for which the personal data will be stored;
 - the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data or the right to object;
 - the right to lodge a complaint with a supervisory authority;
 - any available information as to the data sources;
 - the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- The data controller shall provide information within a maximum of one month from the submission of the request.

8.3 Right to Rectification

The data subject shall have the right to obtain from the A-Lap Fémipari és Kereskedelmi Kft. the rectification of inaccurate personal data concerning him or her, and he or she also has the right to have incomplete personal data completed.

8.4 Right to Erasure

The data subject shall have the right to obtain from A-Lap Fémipari és Kereskedelmi Kft. the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

The data cannot be erased if data processing is necessary:

for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

for reasons of public interest in the area of public health; for archiving purposes in the public interest, scientific or historical research purposes or statistical purpose; for the establishment, exercise or defence of legal claims.



8.5 Right to Restriction of Processing:

The data subject shall have the right to obtain from A-Lap Fémipari és Kereskedelmi Kft. the restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing; for a period until the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, 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.

8.6 Right to Data Portability

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.

8.7 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 for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. 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.

8.8 Right to Withdraw

The data subject shall have the right to withdraw his or her consent at any time.

8.9 Right to Lodge a Complaint with a Supervisory Authority

The data subject shall have the right to lodge a complaint with a supervisory authority if he or she considers that the processing of personal data relating to him or her infringes this regulation. The court shall handle such disputes with priority.

8.10 Privacy Authorities

Complaint can be lodged with the Hungarian National Authority for Data Protection and Freedom of Information:

Name:	Hungarian National Authority for Data Protection and Freedom of Information
Registered office:	1125 Budapest, Szilágyi Erzsébet Alley 22/C
Mailing address:	1530 Budapest, Mail Box: 5.
Phone:	0613911400
Fax:	0613911410



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

9 Further Provisions

Data processing activity not listed in this regulation shall be provided in the course of data collection. We are informing our clients that the court, the public prosecutor, the investigating authority, the minor offences authority, the administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information, the Hungarian National Bank, as well as other bodies authorized by law have the right to contact the data controller with the aim of providing, communicating or transmitting files or data.

If the authority indicates the exact purpose and scope of the data, A-Lap Fémipari és Kereskedelmi Kft. provides them with the personal data in such extent that is indispensable to achieve that purpose.

Tápiószecső, 22 May 2018.