Privacy Policy – Szekszard Printing House Ltd.

1. Purpose of the Privacy Policy

Szekszard Printing House Ltd. (hereinafter referred to as the "Service Provider" or "Data Controller") acknowledges the contents of this legal notice as binding upon itself. The company undertakes to ensure that all data processing activities related to its operations comply with the requirements specified in this policy, applicable national legislation, and legal acts of the European Union.

The privacy principles concerning the data processing practices of Szekszard Printing House Ltd. are continuously available at <u>www.szekszardinyomda.hu</u>.

Szekszard Printing House Ltd. reserves the right to modify this policy at any time, providing adequate notice of any changes to its audience.

If you have any questions related to this statement, please contact us, and our colleagues will respond to your inquiry.

Szekszard Printing House Ltd. is committed to protecting the personal data of its clients and partners and considers it of paramount importance to respect their right to informational self-determination. The company treats personal data as confidential and takes all necessary security, technical, and organizational measures to ensure the safety of such data.

This policy outlines Szekszard Printing House Ltd.'s data management practices.

2. Data Controller Information

If you wish to contact our company, you may do so via the following:

Email: info@szekszardinyomda.hu

Phone: +36 74 411 422

All emails received by Szekszard Printing House Ltd. are deleted no later than one year after the disclosure of data.

Name: Szekszard Printing House Ltd.

Registered office: 7630 Pécs, Üszögi Kiserdő u. 1/C

Company registration number: 02-09-076825

Represented by: Katalin Vadász, Managing Director

Tax number: 10730038-2-02

Phone number: +36 74 411-422

Email: info@szekszardinyomda.hu

Date Protection Officer

Name: Katalin Vadász, Managing Director Phone: + 36 74 411-422

3. Scope of Processed Personal Data

3.1. Technical Data

Szekszard Printing House Ltd. selects and operates the IT tools used in providing its services to ensure that the processed data:

- s accessible only to authorized individuals (availability),
- is authentic and verifiable (authenticity),
- remains unchanged (data integrity), and
- *•* is protected against unauthorized access (confidentiality).

The company protects data from unauthorized access, modification, transmission, disclosure, deletion, destruction, and accidental loss through appropriate measures.

It employs technical, organizational, and structural safeguards to ensure the level of protection corresponds to the risks associated with the data processing.

Szekszard Printing House Ltd. ensures:

- Confidentiality: Only authorized persons can access the data;
- Integrity: The accuracy and completeness of the data and processing methods are protected;
- Availability: Data is accessible when needed by authorized users, along with the tools required to access them.

3.2. Cookies

3.2.1. Purpose of Cookies

Cookies are small data packages stored on the user's device and retrieved on future visits. Their functions include:

- Collecting information about visitors and their devices;
- Remembering users' personal settings (e.g., for online transactions);
- Simplifying website usage;
- Providing a high-quality user experience.

Cookies may allow the service provider to link current visits with past ones — but only with respect to its own content.

3.2.2. Strictly Necessary Session Cookies

These cookies ensure the full and seamless browsing of <u>www.szekszardinyomda.hu</u>, enable the use of its features, and access to services available on the site. Their validity lasts until the end of the session; they are deleted once the browser is closed.

3.2.3. Third-Party Cookies (Analytics)

Szekszard Printing House Ltd. uses Google Analytics, a third-party service, for statistical purposes. It collects data on how visitors use the website to help improve the site's development and user experience. These cookies remain on the user's device until they expire or are manually deleted.

4. Intended Use and Retention Period of Processed Data

Activity and Purpose	Use	Legal Basis	Retention Period
		Legitimate interest of the company	90 days

5. Purpose, Method, and Legal Basis of Data Processing 5.1. General Principles of Data Processing

Szekszard Printing House Ltd.'s data processing activities are based on voluntary consent or legal authorization. In the case of voluntary consent, individuals may withdraw their consent at any stage of the data processing.

In some cases, the processing, storage, and transmission of certain data are required by law. Customers will be informed separately in such cases.

We would like to draw the attention of those providing data to Szekszard Printing House Ltd. that if they provide data not belonging to themselves, it is their responsibility to obtain the consent of the data subject.

Our data processing principles comply with current data protection legislation, in particular

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information;
- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR);
- Act V of 2013 on the Hungarian Civil Code;
- Act C of 2000 on Hungarian Accounting;
- Act LIII of 2017 on the Prevention of Money Laundering and Terrorist Financing;
- Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises.

6. Physical Storage Locations of the Data

Your personal data (i.e., data that can be linked to you personally) may come into our possession in the following ways: on the one hand, in connection with maintaining the internet connection, technical data regarding your computer, browser, internet address, and the pages visited are automatically generated in our computer system; on the other hand, you may also provide your name, contact details, or other information if you wish to get in personal contact with us via the website.

Technically recorded data during system operation: information generated by the user's computer during the voting process, which is recorded by the system of Szekszard Printing House Ltd. as a result of automatic technical processes. These automatically recorded data are logged by the system automatically at the time of login and logout, without any specific declaration or action by the data subject. These data cannot be linked to other personal user data — except in cases mandated by law. Only Szekszard Printing House Ltd. has access to these data.

7. Data Transfers, Data Processing, and Parties with Access to the Data

Data transfer: Visitor data are received by Google for statistical purposes, but they are processed anonymously and in aggregated form, making individual users unidentifiable.

Data processing: Google, as the data processor, processes the data solely based on the instructions of Szekszard Printing House Ltd., and in compliance with data protection regulations.

Access to data: Access to the data is limited to the following persons and organizations:

• Website administrators: For technical maintenance and operation.

• Employees of Szekszard Printing House Ltd.: Only those whose duties require it.

• Data processors (e.g., hosting providers): For technical operation and storage of the website, strictly within the boundaries defined by contract.

The data processor is:

Data Controller: "TARR" Építő, Szolgáltató és Kereskedelmi Korlátolt Felelősségű Társaság

- Registered Office: 7100 Szekszárd, Kadarka u. 18.
- Phone: 1223
- Fax: +36 (74) 413 636
- Website: <u>www.tarr.hu</u>
- Facebook: <u>https://www.facebook.com/TarrKft</u>
- Data Protection Officer: Dr. Zsuzsanna Litter
- Contact: dpo@tarr.hu

8. Rights of the Data Subject and Legal Remedies

The data subject may request information on the processing of their personal data, request the rectification or — except for mandatory data processing — the erasure or withdrawal of their personal data, exercise their right to data portability and objection, via the method indicated at the time of data collection or using the contact information of the data controller listed above.

8.1. Right to Information

Szekszard Printing House Ltd. takes appropriate measures to provide all necessary information on the processing of personal data to the data subject as per Articles 13 and 14 of the GDPR, and all communications under Articles 15–22 and 34 in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

8.2. Right of Access

The data subject has the right to obtain confirmation as to whether or not their personal data are being processed and, if so, access to the personal data and the following information: the purposes of processing; the categories of personal data; the recipients or categories of recipients, especially in third countries or international organizations; the planned duration of data storage; rights related to rectification, erasure, restriction, and objection; the right to lodge a complaint with a supervisory authority; the source of the data; the existence of automated decision-making including profiling, and meaningful information about the logic involved, as well as the significance and potential consequences of such processing for the data subject. The data controller shall provide this information within one month of receiving the request.

8.3. Right to Rectification

The data subject may request the rectification of inaccurate personal data processed by Szekszard Printing House Ltd. and the completion of incomplete data.

8.4. Right to Erasure

The data subject has the right to obtain from Szekszard Printing House Ltd. the erasure of personal data concerning them without undue delay where one of the following grounds applies:

• The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

• The data subject withdraws consent and there is no other legal basis for the processing;

• The data subject objects to the processing and there are no overriding legitimate grounds;

• The personal data have been unlawfully processed;

• The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

• The personal data were collected in relation to the offer of information society services.

Erasure cannot be requested if processing is necessary for: exercising the right of freedom of expression and information; compliance with a legal obligation under Union or Member State law; public interest; scientific or historical research or statistical purposes based on public interest; or the establishment, exercise or defense of legal claims.

8.5. Right to Restriction of Processing

Szekszard Printing House Ltd. shall restrict processing at the request of the data subject if any 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 data accuracy;

• The processing is unlawful and the data subject opposes the erasure and requests restriction instead;

• The controller no longer needs the personal data, but they are required by the data subject for legal claims;

• The data subject has objected to processing pending verification whether the controller's legitimate grounds override those of the data subject.

Where processing has been restricted, such data shall — with the exception of storage — only be processed with the data subject's consent or for the establishment, exercise or defense of legal

claims, or to protect the rights of another natural or legal person, or for reasons of important public interest of the Union or a Member State.

8.6. Right to Data Portability

The data subject has the right to receive the personal data concerning them, which they have provided to the data controller, in a structured, commonly used, machine-readable format, and to transmit those data to another controller.

8.7. Right to Object

The data subject has the right to object, on grounds relating to their particular situation, at any time to the processing of personal data concerning them which is based on tasks carried out in the public interest or the exercise of official authority, or the legitimate interests pursued by the controller or a third party, including profiling. The controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds which override the interests, rights and freedoms of the data subject or for legal claims.

8.8. Automated Decision-Making, Including Profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing — including profiling — which produces legal effects or similarly significantly affects them.

8.9. Right to Withdraw Consent

The data subject has the right to withdraw their consent at any time.

8.10.Right to Legal Remedy

The data subject may take legal action against the data controller in the event of a rights violation. The court shall act without delay.

8.11.Data Protection Authority Procedure

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

- Name: Nemzeti Adatvédelmi és Információszabadság Hatóság
- Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.
- Mailing address: 1530 Budapest, Pf. 5.
- Phone: +36 1 391 1400
- Fax: +36 1 391 1410
- Email: ugyfelszolgalat@naih.hu
- Website: <u>http://www.naih.hu</u>

9. Other Provisions

For data processing not listed in this notice, we provide information at the time of data collection. Please note that the court, prosecutor's office, investigating authority, regulatory authority, the Hungarian National Bank, or other entities authorized by law may request information, data, or documents from the data controller.

Szekszard Printing House Ltd. shall provide personal data to such authorities — provided that the request specifies the purpose and scope of the requested data — only to the extent strictly necessary to fulfill the request.