

This Privacy notice is intended for external partners of Knipl Kft., including visitors and users of the website www.knipl.com.

1. INTRODUCTION

Knipl Kft. (hereinafter referred to as the "Data Controller"), as the Data Controller, by publishing this Privacy Policy, describes the principles of its data management, which the Data Controller acknowledges as binding. The Data Controller shall take all measures reasonably necessary to ensure the security of the personal data it processes.

This Privacy Notice sets out in plain language how we process your personal data. In the Privacy Notice, the Data Controller will inform the relevant persons clearly and in detail about all relevant facts related to the processing of their data.

In the course of its operations, the Data Controller processes personal data of external partners and their representatives who come into contact with it in order to provide them with appropriate services. This Privacy Notice has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of personal data of natural persons and on the free movement of such data, taking into account the content of Act CXII of 2011 on the right to information self-determination and freedom of information.

The full Privacy Policy is available by writing to gdpr@knipl.com.

Name and contact details of the service provider, data controller:

- Name: KNIPL Festéstechnológiai Berendezéseket Gyártó és Forgalmazó Korlátolt Felelősségű Társaság.
- Short name: Knipl Kft.
- Tax number: 11860468-2-41
- Company registration number: 01 09 680143
- Name of the court registering the company: Registered office and billing address: 1037 Budapest, Remetehegyi út 25.
- Location: 7150 Bonyhád, Borbély u. 25.
- Website name and address: www.knipl.com
- E-mail: info@knipl.com
- Phone: +36 74 550 540

2. DEFINITIONS OF TERMS

"Personal data": any information relating to an identified or identifiable natural person (hereinafter "relevant person"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, performance result, online identifier or to one or more factors.

"Special personal data": any data covered by the special categories of personal data, in particular personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data revealing the identity of natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons.

"Data management": any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Restriction of data management": the marking of personal data stored for the purpose of their future processing in a modified way, downgrading or deletion.

"Registration system": a set of personal data, structured in any way, whether centralised, decentralised or functional, including geographical, and accessible on the basis of specific criteria.

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"Data controller": a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller itself or the specific criteria for the designation of the controller may also be determined by Union or Member State law.

"Data processor": a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller (e.g. an accountant or auditor of a company).

"Recipient": a natural or legal person, public authority, agency or any other body with whom or to which personal data is disclosed, whether or not a third party. Public authorities that may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities must comply with the applicable data protection rules in addition to the purposes of the processing.

"Consent of the relevant person": a freely given, specific and informed indication of the relevant persons's wishes by which he or she signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or an unambiguous act of affirmation (e.g. by clicking on a consent box, by signing a dataset).

"Data Breach" means a breach of personal data processing security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Anonymised information: information relating to an unidentified or identifiable natural person and personal data that have been anonymised in such a way that the relevant person is not or is no longer identifiable to the third party concerned.

Third country: a country outside the European Union or the EEA, including for data processing purposes International Organisations.

Public interest data: any data - not covered by the concept of public interest data - whose disclosure, disclosure or accessibility is required by law in the public interest (e.g. names of the directors and officers of a company, address).

3. THE RANGE OF RELEVANT PERSON

The external partners of the Kft., representatives of partners, identifiable natural persons who use the services of the Website, directly or indirectly.

4. THE PRINCIPLES OF DATA MANAGEMENT

- The processing of personal data must be lawful, fair and transparent.
- Personal data may be collected only for specified, explicit and legitimate purposes, and processing for archiving purposes in the public interest, scientific and statistical purposes (purpose limitation principle) is not incompatible with the original purpose.
- Processing of personal data should be limited to what is relevant for the purpose (data minimisation principle).
- The personal data must be accurate and up-to-date, and inaccurate data must be corrected or deleted without delay (principle of accuracy).
- Personal data must be recorded in a form which permits identification of the relevant person only for the time necessary to achieve the purposes for which the data are processed (principle of limited retention).
- Personal data must be processed in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("integrity and confidentiality"), by implementing appropriate technical or organisational measures.

The Data Controller will ensure compliance with the Principles in its activities and will be ready to demonstrate compliance at any time (accountability principle).

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5. THE WAY THE DATA IS PROCESSED				
The relevant person in the processing	Personal data	Purpose of data processing	Duration of processing	Legal basis
Candidates applying for a job vacancy	Name, phone number, e-mail, place and date of birth, schools attended, language skills Additional information provided in your CV	Checking admission criteria, contacting	6 months after receipt, unless the applicant declares a longer period	Legitimate interest, consent of the relevant person
Representatives of contracting authorities and/or contracting entities (legal entities)	Contact name, phone number, e-mail	Contact and information	The contact, mandate after the termination of 8 years	Legitimate interest
Individuals (natural persons), self-employed contracting authorities and/or contracting entities	Name, name at birth, mother's name, telephone number, email, website address, address, registered office, address of establishment, tax and other data required for the fulfilment of accounting obligations (tax identification number, tax number, number of sole trader, personal identity card, bank account number)	Liaising and providing information Issuing proper invoices, creating contracts, defining their content, amending them, monitoring their performance, invoicing the resulting fees and enforcing the related claims.	The contact, mandate after the termination of 8 years, or the limitation period set out in Act XCII of 2003 on the Rules of Taxation	Legitimate interest, to fulfil accounting obligations under Act C of 2000, Act XCII of 2003
The relevant person in the processing	Personal data	Purpose of data processing	Duration of processing	Legal basis
Person filling in the website contact form	Contact name (first and last name), phone number, email	Contact and information	8 years after the end of the relationship (non-order, equipment handover, end of service)	Consent of the person concerned
Individuals entering a site	Image recording, name, phone number (additional data may be added in case of emergency)	Liaison and information provision, internal security	30 days after taking the picture	Legitimate interest, consent of the relevant person

The Data Controller shall process personal data provided on the basis of the User's consent until the purpose of the processing is fulfilled or the User's consent is withdrawn. Unless otherwise provided by law, the Data Controller shall

- a) to comply with a legal obligation to which it is subject, or
- b) for the purposes of the legitimate interests pursued by the controller or by a third party, where the pursuit of those interests is proportionate to the restriction of the right to the protection of personal data without any further specific consent and even after the withdrawal of the relevant person's consent./ Act CXII of 2011, § 6 (5) /

The data must be deleted immediately if the original purpose has been achieved and the period of data processing has expired. The relevant person may withdraw his or her consent to the processing at any time by sending an e-mail to the contact e-mail address (gopr@knipl.com). If there is no legal obstacle to the deletion, his or her data will be deleted.

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The data may be accessed by: the controller and its authorised employees.

The relevant person may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her and may object to the processing of such personal data and the relevant person's right to data portability.

The relevant person may withdraw his or her consent at any time, but this does not affect the lawfulness of the processing carried out on the basis of the consent prior to its withdrawal.

The relevant person concerned may exercise the right to lodge a complaint with the supervisory authority.

6. THE PERSON AUTHORISED TO PROCESS THE DATA

Processors (those who carry out processing on behalf of the controller).

The data controller uses data processors to facilitate its own data processing activities and to fulfil its contractual and legal obligations with the relevant person. The controller shall place great emphasis on using only processors that provide adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the requirements of the GDPR and to protect the rights of relevant persons.

The processor and any person acting under the control of the controller or the processor who has access to the personal data shall process the personal data covered by this Policy only in accordance with the instructions of the controller.

The controller is legally responsible for the activities of the processor. A processor is only liable for damage caused by processing if it has failed to comply with the obligations specifically imposed on processors by the GDPR or if it has disregarded or acted contrary to lawful instructions from the controller. The processor has no substantive decision-making power with regard to the processing of the data.

Service	Data processor
Business accounting services	Gizella Deák Individual Entrepreneur, 7695 Mecseknádasd, Kossuth Lajos u. 111 (tel. 36/20-242-6239, deakgizella@freemail.hu) Scope of data: personal data on the account
Postal services, delivery, parcel delivery	Magyar Posta Zrt. Scope of data: name, telephone number, email, address, residence, domicile, registered office of the recipient
Website, hosting provider	PaprikaSoft Kft., Head office: 8600 Siófok, Aradi vértanúk útja 36. Phone: +36 20 414 0284, E-mail: office@paprikasoft.com Scope of data: information sent by email, website messaging data (name, email, phone number)
Other subcontractors	If necessary, the Company will engage a third party, in which case it will inform the Customer, requesting its consent to the transfer of its personal data to the third party, on the understanding that the third party will use the data only for the purposes of the delivery. Scope of data: name, address and residence of the customer

7. DATA TRANSMISSION, DATA LINKING

The Data Controller does not sell, rent or in any way make available personal data or information about the data subjects to other companies or individuals, and only transfers it to third parties with the consent of the relevant person.

The Data Controller shall ensure adequate security of the data to the extent that it can be expected to do so, and shall take the technical and organisational measures necessary to ensure the enforcement of data protection rules and principles and to facilitate the security of personal data.

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8. COOKIES

Cookies are placed on the user's computer by the websites visited and contain information such as the page settings or login status.

Cookies are therefore small files created by the websites you visit. They improve the user experience by saving browsing data. Cookies help the website to remember your website settings and offer you locally relevant content.

A small file (cookie) is sent by the provider's website to the website visitors' computer in order to establish the fact and time of the visit. The provider informs the website visitor of this.

- Relevant persons concerned: visitors to the website.
- Purpose of data processing: additional services, identification, tracking of visitors.
- Legal basis for processing: no consent is required from the relevant person where the sole purpose of the use of cookies is to transmit communications over an electronic communications network or where the service provider strictly needs the cookies to provide an information society service explicitly requested by the subscriber or user.
- The scope of the data: unique ID number, time, configuration data.
- Duration of processing, deadline for deletion of data:

Type of cookie	Legal basis for processing	Duration of data processing
Session cookies (session)	Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.), Section 13/A (3)	Period until the end of the relevant visitor session
Permanent or saved cookies		until expiry or deletion by the user
Statistical, marketing cookies		1 month - 2 years

The user has the option to delete cookies from browsers at any time by going to the Settings menu.

Data controllers entitled to know the data: no personal data is processed by the data controller through the use of cookies.

Data storage method: electronic.

9. GOOGLE ANALYTICS

Our website uses Google Analytics.

Google Analytics uses internal cookies to compile reports for its customers on the habits of website users.

On behalf of the website operator, Google will use this information to evaluate how users use the website. As an additional service, the website operator will compile reports on website activity for the website operator so that it can provide additional services.

Google Privacy Policy: <https://policies.google.com/privacy?hl=hu>

10. THE RIGHTS RELATING TO DATA PROCESSING

Right of access

You have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is taking place, you have the right to access your personal data and the information listed in the Regulation.

The right to rectification

You have the right to have inaccurate personal data relating to you corrected by the controller without undue delay at your request. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

The right to erasure

You have the right to have personal data concerning you erased by the controller without undue delay at your request, and the controller is obliged to erase personal data concerning you without undue delay under certain conditions.

The right to blocking

You can ask us to block your data using the contact details provided. The blocking will last as long as the reason you have given us makes it necessary to store the data. Upon your request, we will do so without delay, but within a maximum of 30 days, by sending you an e-mail to the e-mail address you have provided.

The right to protest

You may object to the processing of your data by using the contact details provided.

Deadline for action

The data controller will inform you of the action taken on these requests without undue delay, but in any event within 1 month of receipt of the request, by sending an e-mail to the e-mail address you have provided.

11. 14. THE POSSIBILITY TO ENFORCE RIGHTS IN RELATION TO DATA PROCESSING

If you experience unlawful processing, please notify us so that we can restore the lawful status within a short period of time. We will do our utmost to resolve the problem in your interest. To exercise your rights regarding data processing, please send an email to gdpr@knipl.com.

If you consider that the lawful status cannot be restored, please notify the authority using the following contact details:

National Authority for Data Protection and Freedom of Information

Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat \(at\) naih.hu](mailto:ugyfelszolgalat@naih.hu)

12. THE LAW ON WHICH THE PROCESSING IS BASED

- 1) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (April 27. 2016) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Regulation 95/46/EC (general data protection regulation) (EEA-related text), hereafter Regulation/R.
- 2) Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, hereinafter referred to as Info tv.
- 3) Act C of 2000 on Accounting, - hereinafter referred to as the Act on Accounting.
- 4) CXXXVII of 2007 Act on General Sales Tax, - hereinafter referred to as ÁFA Tv.
- 5) Act CL of 2017 on the Rules of Taxation, hereinafter referred to as Art.
- 6) Act I of 2012 on the Labour Code, - hereinafter referred to as Mt.
- 7) Act LXXX of 1997 on the entitlement to social security benefits and private pensions and on the coverage of these services, hereinafter referred to as the Social Insurance Act.
- 8) Act C of 2012 on the Criminal Code, hereinafter referred to as the Criminal Code.
- 9) Act LXXXI of 1997 on Social Insurance Pension Benefits

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- 10) Act XXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigation (hereinafter referred to as the "Act on the Protection of Personal and Property and Private Investigation")
- 11) 335/2012 (XII. 4.) Government Decree on the detailed rules for the provision of postal services and the postal service related to official documents, as well as on the general terms and conditions of postal service providers and on items excluded from or conditionally delivered by postal services,
- 12) Regulation (EC) No 883/2004 of the European Parliament and of the Council of 29 April 2004 on the coordination of social security systems
- 13) Recommendations of the National Data Protection Office, hereinafter referred to as the "NAIH Recommendation"

20.09.2022