

PERFINAL DATA PRIVACY INFORMATION SHEET

On the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: **GDPR**), **Perfinal Technologies Ltd.** (Registered seat: 4024 Debrecen, Kossuth utca 7. 2. em. 1. ajtó.; website: <https://www.perfinal.com>, contact details: finance@perfinal.hu; hereinafter: **“Perfinal”** or **“Data Controller”**) summarizes the most important rules of the personal data¹ processing operations regarding partner relationship management, facilitation of Research and Development project(s) and other research project(s) (hereinafter: Project):

	DATA PROCESSING OF NATURAL PERSON	DATA PROCESSING OF LEGAL PERSONS’ REPRESENTATIVE OR CONTRACT PERSON
Who is the data subject?	Data subject is the natural person, who <ul style="list-style-type: none"> - provides personal data regarding a Project - concludes an agreement with the Data Controller 	Data subject is a natural person who <ul style="list-style-type: none"> - acts as the representative of the partner (e.g.: managing director etc.) in connection to the conclusion/amendment/termination of the engagement agreement or during a Project, - is indicated as contact person in the engagement agreement or in any other manner by the contracting partner or indicated as a participant in frame of a Project.
What is the scope of data processing?	<ul style="list-style-type: none"> - communication fulfilment of an agreement - communication fulfilment of a Project - billing 	<ul style="list-style-type: none"> - communication fulfilment of an agreement - communication fulfilment of a Project - billing

¹ Personal data means any information relating to an identified or identifiable natural person (‘data subject’). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

	- fulfilment of certain obligations prescribed by professional organization / authority - enforcement of a claim	- fulfilment of certain obligations prescribed by professional organization / authority - enforcement of a claim
Processed data	- name and other personal identifiers - position - expertise - email address - phone number - employment related data	- name and other personal identifiers - position - expertise - email address - phone number - company / entity name
What is the source of the data?	The natural person, or the representative of the legal entity provides the data to the Data Controller and / or the Data Controller collects the data from official authentic registry.	
Who is entitled to process the data?	The data may be known and processed by those the employees and proxies of the Data Controller, whose obligation is taking part in the fulfilment of the data processing purposes.	
Nature of data provision and potential consequences of the non-fulfilment of data provision	The provision of the data is necessary partly for the conclusion of the engagement agreement, partly for the fulfilment of the agreement or fulfilling the undertakings of a Project. The potential consequences of the non-fulfilment of the data provision are the failure to conclude the agreement, failure to provide services or failure to provide the full scope of services, or failure to achieving the goals of a Project settled.	
	Scope of controlled data / legal basis	Scope of controlled data / legal basis
	Personal data / consent of the natural person [GDPR Article 6. Section (1) Point a)],	Personal data of the partner's representative / services agreement [GDPR Article 6. Section (1) Point b)],
	Personal data / agreement [GDPR Article 6. Section (1) Point b)]	Personal data of the additional contact person / Legitimate interest of the Data Controller [GDPR Article 6. Section (1) Point f)]
	Balancing test:	

Assessment of the existence of the legitimate interest of the Data Controller

1. Description of the data processing purpose

The purpose of the data controlling is to control certain personal data of the contact persons (hereinafter: data subjects) indicated in the agreement or appointed during a Project (hereinafter together: undertakings).

2. Presentation of the legitimate interest

It is in the legitimate interest of the Data Controller to ensure unhindered communication with the partner in order to efficiently perform the tasks / goals set out in the undertakings.

Based on the above Point 1 and 2, the existence of legitimate interest can be proved; therefore, the necessity of the processing can be examined.

Is the data processing necessary?

1. Why is the data processing strictly necessary and suitable to reach the purpose of data processing?

It is the legitimate interest of the Data Controller to perform the professional tasks / goals set out in the undertakings with optimal time commitment and efficiency. The administrative tasks (e.g.: obtaining documents, getting contact, providing information) regarding the performance of the undertakings

may be completed most efficiently if the Data Controller keeps direct contact with the employee / representative(s) of the partner, who is responsible for the above tasks and has competence in these matters.

2. Are there any other alternative solutions to reach the same purpose?

No alternative solutions are available for the Data Controller.

Based on the above Point 1 and 2, the necessity of the legitimate interest can be proved; therefore, the proportionality of the processing can be examined.

Is the data processing proportionate?

1. Legitimate interest of the Data Controller

The interest of the Data Controller is the unhindered communication with the partner in order to perform the undertakings.

2. Legitimate interest of the data subject

The data processing affects the right of informational self-determination of the data subject, which might be restricted with regard to the principles of necessity and proportionality.

Nature of the personal data:

The name, (work) phone number and (work) email address of the contact person (data subject), certain data related to his or her expertise and / or entity name (*if applicable*). The personal

		<p>data are provided by the partner. The transferred data do not contain sensitive data.</p> <p>The advantageous / disadvantageous effects of the data processing with respect to the data subjects:</p> <p>The following rights of the data subject may be breached, or the data controlling may have the following disadvantageous effect on the data subject: Right to wear one's name, identification of a natural person based on other data.</p> <p>Relationship between the data subject and the Data Controller: No relationship exists between the data subject and the Data Controller, the Partner and the Data Controller concluded an engagement agreement or cooperate during a Project.</p> <p>Method of data processing: Data processing takes place within an EEA member state in paper and electronic form.</p> <p>Feasible expectations of the data subject/guarantees: The Data Controller controls the data of the data subject exclusively for the performance of the agreement / related to a Project. The data may only be accessed by those who are entitled to it.</p> <p><u>Result</u> Based on the above, the Data Controller considers its legitimate interest to stand in connection to controlling the data of the contact persons set out in the undertakings with</p>
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		the partner; the legitimate interest is not overdriven by the individual's rights and freedoms.
What is the period of data processing?	8 years from the termination of the contract or 5 years after the end of a Project unless a longer retention period stipulated by law or upon withdrawal of the consent.	
Method of data processing	The data processing may be paper based (records) or by electronic means (saving the data into the server, recording the data into contact management / other software programs).	
Right of the data subject	<p>According to Sections 12-22 of the GDPR, the data subject has the following rights concerning the data controlling activity contained in this privacy policy. The data subject can:</p> <ul style="list-style-type: none"> - ask for information concerning the controlling of his/her personal data (right to be informed), - ask for rectification of the data in case those are incorrect, inaccurate, or incomplete (right to rectification), - ask for the deletion of his/her personal data in case they are no longer necessary, or the controlling is unlawful (right to erasure or 'right to be forgotten'), - in certain cases, ask for the restriction of the data controlling (right to restriction of data processing/ to blocking), - have the right object to the processing of the personal data in certain cases (right to object), - have the right to data portability in certain cases. <p>1. Rights of information (right to access)</p> <p>The data subject shall have the right to know whether personal data are stored concerning him or her by the Data Controller and if so, has the right to obtain the following information:</p> <ul style="list-style-type: none"> - the categories, the legal basis, the purpose and the duration of data controlling; 	

- scope of persons that can have access to the data of the data subject and the circumstances, legal basis for such data transfers;
- source of personal data;
- if the Data Controller uses automated decision making process and if so, the logic of it, including profiling;
- the fact of data protection incident, its circumstances, effects and the steps for remedying it;
- the rights of data subjects concerning the data controlling and the method of exercising those rights.

2. Right to rectification

In case the data subject believes that the personal data concerning him / her are inaccurate, erroneous or incomplete, the data subject shall have the right to request the Data Controller the rectification or the completion of the concerned data.

3. Right to erasure (right to be forgotten)

The data subject shall have the right that upon his / her request the Data Controller erases the personal data concerning him / her in the following cases:

- further processing is not required for the purposes set out in this privacy policy;
- the purpose of data controlling set out in this privacy policy no longer exists or the duration of the data controlling period stipulated by law expired;
- if the data subject withdraws his/her consent to the data controlling and another legal basis for processing no longer exists;
- the Data Controller processed the personal data unlawfully;
- if it is ordered by court or by the National Authority of Data Protection and Freedom of Information (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság);
- the erasure of data is needed for the fulfilment of a legal obligation prescribed in the laws of a member state or the European Union and applicable to the Data Controller.

Where the Data Controller has made the personal data public and is obliged to erase the personal data in accordance with the above, the Data Controller, taking into account the available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are controlling the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data (for example erasure from among search results of browsers).

The Data Controller draws the data subject's attention to that personal data cannot be deleted especially if needed for the submission of legal claims or protection thereof.

4. Right to restriction of processing (right to block)

The data subject shall have the right to obtain from the Data Controller restriction of data controlling where one of the following applies:

- the accuracy of the personal data is contested by the data subject (in which case the restriction is for a period enabling the Data 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 Data Controller no longer needs the personal data for the purposes of the data controlling, but the data is required for the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing (in which case the restriction is for the period pending the verification whether the legitimate grounds of the controller override those of the data subject).

Where data controlling has been restricted, such personal data may - with the exception of storage - be processed only 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. The data subject upon whose request the data controlling was restricted shall be informed by the Data Controller before the restriction of data controlling is lifted.

<p>How can the data subject examine its rights?</p>	<p>The data subject may examine his / her rights in connection with data processing as per the below:</p> <ul style="list-style-type: none"> - in writing, by sending it electronically to the following name, and email address: Data Protection Perfinal, finance@perfinal.com, - in writing, by post to the following address: 4024 Debrecen, Kossuth street 7. 2. fl. 1. door - in person, verbally in 4024 Debrecen, Kossuth street 7. 2. fl. 1. door. weekdays from 12 to 14. <p>The Data Controller shall examine and answer the declaration and make the necessary measures specified by law, latest within 15 days from the delivery of the email or the post.</p>
<p>Where can the data subject seek remedies in case of a breach?</p>	<ol style="list-style-type: none"> 1. Judicial remedy <p>In case of any violation of the data subject's rights, he or she may seek judicial remedy. The action shall fall within the competence of the tribunal according to his/her home address or his/her residence, depending on his or her choice.</p> <ol style="list-style-type: none"> 2. Complaint with the Authority <p>The data subject may lodge a complaint with the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data protection and Freedom of Information)</p> <p>address: 1055 Budapest, Falk Miksa street 9-11. postal address: 1374 Budapest, Pf. 603. telephone: +36 (1) 391-1400 web page: http://www.naih.hu email address: ugyfelszolgalat@naih.hu</p>

Data security

Data Controller ensures the security of the data; therefore, the Data Controller implements appropriate technical and organisational measures (for example: pseudonymisation and encryption; assurance of the ongoing confidentiality, integrity, availability and resilience of processing systems and service measures; testing, assessment and evaluation of the processing system) in order to ensure a level of security appropriate to the risk. Furthermore, the Data Controller intends to take into consideration the actual state of technical development when defining and implementing the technical and organisational measures. The Data Controller guarantees the fulfilment of data security by internal policies, orders and procedures.

With respect to security of information technology, the Data Controller ensures especially:

- measures against the unauthorized access to personal data, including the physical and logical protection of the software and hardware tools and devices;
- measures for possibility of recovering the data, including regular backups and separate handling of backups;
- anti-virus protection of the data.