

DATA PROTECTION POLICY

to inform you, as a visitor to our website and a user of our services, about the data processing and data protection rules of our Company.

1. What are the principles we follow during data processing?

During data processing our Company adopts the following principles:

- ⊗ personal data are processed in a lawful and fair way, transparently for you.
- ⊗ personal data are exclusively collected for the specified, explicit and legitimate purposes, and they are not processed in ways incompatible with the purposes.
- ⊗ the personal data we collect and process are appropriate and relevant for the data processing objectives, and are limited to the necessary extent.
- ⊗ our Company shall make all reasonable measures necessary to ensure that the data we process are accurate and up-to-date; any inaccurate personal data shall be erased or rectified.
- ⊗ personal data are stored in a way that they can be identifiable only for the duration necessary for achieving the objectives of the personal data processing.
- ⊗ the appropriate security of the personal data is ensured by suitable technical and organizational measures against unauthorized or unlawful processing, accidental loss, destruction or damage,

2. Your personal data shall be

- ⊗ processed – that is collected, recorded, organized, stored and used – on the basis of your prior informed and voluntary consent, only to the extent necessary, and always with a certain purpose.
- ⊗ in some cases the processing of your data is mandatory and based on regulatory requirements, in such cases your attention will be called to this fact.
- ⊗ furthermore, in some cases the processing of your personal data is in the legitimate interest of our Company or a third person – such case may be the operation, development or the safety of our website.

3. Who are we?

The name of our Company:	Detcom Systems Ltd.
The registered office of our company:	H– 4031 Debrecen József street 20.
The website of our Company:	www.detcom.hu
Means of communication:	info@detcom.hu
Postal address:	H–4031 Debrecen József street 20.
Telephone:	(+36) 20 429 8949
E-mail address:	info@detcom.hu
Tax number:	26164610-2-09
Company registration number:	09-09-029215

Pursuant to Article 37 of the GDPR, our Company is not required to appoint a data protection officer.

The name, address and contact information of the Internet hosting provider of our Company:

DOTROLL KFT. 1148 Budapest, Fogarasi road 3-5.

In order to provide high quality service to our customers, the Company – in the course of data processing – engages the following data processors:

NAME	ADDRESS	ACTIVITY
DOTROLL KFT.	H-1148 Budapest, Fogarasi road 3-5.	<i>email service</i>
DOTROLL KFT.	H-1148 Budapest, Fogarasi road 3-5.	<i>hosting provider</i>

In case the scope of the data processors is modified, the appropriate modifications shall also be made in this Policy.

Data processed by our Company:

Description of the activity, and purpose of data processing	Legal basis	Data processed	Duration
<p>Visiting the website</p> <p>The objective is to ensure the operation of the website according to the intended use and in high quality.</p> <p>to control and improve the quality of our services,</p> <p>to identify malicious visitors attacking our website,</p> <p>to measure the number of visitors,</p> <p>statistical objectives</p>	Legitimate interest of our Company	<p>date of visiting</p> <p>details of the visited subpages,</p> <p>your operating system and browser type</p>	24 months
<p>Administration, complaints</p> <p>response to comments and complaints</p>	legal obligation	<p>full name</p> <p>e-mail address</p> <p>phone number</p> <p>mailing address</p> <p>other personal message</p>	5 years.

The visitors are not requested to enter personal data on our website; such data are stored only after registration, subscribing to the newsletters, or following consent, if it is explicitly requested and consent is provided.

Personal data provided in connection with registration or using our marketing services may not be combined, and basically it is not our intention to identify our visitors.

Further information regarding data processing can be requested at the e-mail address at marketing@amikohome, or at our postal address; our response will be sent without delay to the provided contact within 10 working days (but no later than within 1 month).

4. What cookies are and how they are handled

Cookies are small data files (hereinafter referred to as cookies) sent from a website to your computer when using such website, saved and stored by your Internet browser. Most of the commonly used web browsers (Chrome, Firefox, etc.) accept and authorize the downloading and the use of cookies by default, however, you may modify the browser's settings to refuse or disable the cookies, and you can also delete cookies already stored on your computer. More information is available on the use of cookies in the "Help" menu of your browser.

Some cookies do not require your prior consent. When you first visit our website, you will be provided a short description on them, such cookies are for example authentication cookies, media player cookies, load balancer cookies, session cookies for customizing the user interface, or user-centered secure cookies.

In case of cookies requiring your consent – in case data processing starts on visiting the site – you will be informed by our Company at the time of your first visit, requesting you to accept them.

Our Company does not apply or allow cookies suitable for third persons to collect data without your consent.

Accepting the cookies is not mandatory; however, in this case our Company may not be held liable for the incomplete usability of the website.

What kinds of cookies are used?

Type	Acceptance	Description	Purpose	Validity
<i>system cookies</i>	<i>not required</i>	<i>session cookie of the web application firewall, used for preventing the abuse of cross-references</i>	<i>ensuring the operation of the website</i>	<i>deleted at the end of the browser session</i>
<i>tracking cookie (from third parties)</i>	<i>not required</i>	<i>to identify new sessions and visitors, saved by the Google Analytics web tracking service. creates 3 cookies</i>	<i>during visiting the website, connects to the services of third persons (Google Analytics)</i>	<i>2. cookie 1-1 day 3. cookie 2 year</i>

More information about third party cookies: <https://www.google.com/policies/technologies/types/>, about data protection: <https://www.google.com/analytics/learn/privacy.html?hl=hu>.

5. What else do you need to know about data processing on our website?

You provide your personal data voluntarily during registration or communication with our Company, therefore we kindly ask you to pay particular attention to the authenticity, correctness and accuracy of the entered data, as this is your responsibility. Any incorrect, inaccurate or incomplete data may inhibit the use of our services.

In case you enter the personal data of another person instead of your own, it is presumed that you have the necessary consent of such person.

You are free to withdraw your consent to data processing at any time

- ✦ by cancelling your registration,

Due to technical reasons, we commit to registering the withdrawal of such consent within 15 days, however, please note that we are entitled to process certain data after the withdrawal of your consent, in case it is required in order to fulfill our legal obligations, or to enforce our legitimate interests.

In case misleading personal data are used, or if any visitor commits a criminal offense or attacks the system of our Company, the registration of such visitor will be terminated, and at the same time any relevant data will be deleted without delay, or – if deemed necessary – the data will be preserved during the period of conducting the procedures for determining civil liability or during any criminal proceedings.

6. Other data processing issues

We are only entitled to transfer your data within the framework specified by legislation; in case your data are processed by our data processors, contractual terms are specified to ensure that your personal data may not be used for purposes other than the ones you consented to. For more information please see point 2.

Our Company does not transfer data abroad.

The Court of Justice, the public prosecutor's office, or other authorities (e.g. police, tax authority, National Authority for Data Protection and Freedom of Information) may request information, data or documents from our Company. In such cases we are required to comply with our data reporting obligation, but only to the extent necessary for fulfilling the purpose of the request.

The persons or employees participating in the data processing of our Company are entitled to see your personal data to the extent determined in advance, and they are bound by confidentiality obligations.

Your personal data are protected by appropriate technical and other measures, and we also provide the security and availability of the data; furthermore, they are protected from unauthorized access, modification, damage, disclosure, or any other unauthorized use.

Within the framework of organizational measures, we check physical access, our employees are continuously trained, and appropriate protection is ensured for paper-based documents. As technical measures, encryption, password protection and anti-virus software are used. However, please note that data transfer via the Internet cannot be considered a form of fully secure data transfer. Our Company will make every effort to ensure that the process is as secure as possible, but we cannot take full responsibility for data transfer via our website; however, regarding the data received by our Company, we comply with strict regulations in order to provide the safety of your data, and to prevent any illegal access.

Regarding security issues, your help is requested: please keep your password to our website at a safe place, and do not share it with anyone.

7. What are your rights and available legal remedies?

You may

- ✦ request information on the data processing,
- ✦ request the rectification, modification or supplementation of your personal data we process,

- ❖ object to the data processing, request the erasure or blocking of your data (except for mandatory data processing),
- ❖ appeal to the Court for legal remedy,
- ❖ submit a complaint to the supervisory authority, or initiate procedures (<https://naih.hu/panaszuegyintezes-rendje.html>).

Supervisory authority: Hungarian National Authority for Data Protection and Freedom of Information

- ❖ Registered seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c.
- ❖ Mailing address: H-1530 Budapest, Pf.: 5.
- ❖ Phone: +36 (1) 391-1400
- ❖ Fax: +36 (1) 391-1410
- ❖ E-mail: ugyfelszolgalat@naih.hu
- ❖ Website: <https://naih.hu/>

On your request, we provide information on

- ❖ your data processed by us, or by the assigned data processor,
- ❖ the sources of such data,
- ❖ the purpose and legal basis of the data processing,
- ❖ the period for which the personal data will be processed, and the criteria used to determine that period,
- ❖ the name and address of the data processors, and their activity relating to the data processing,
- ❖ the conditions and effects of any data protection incidents, as well as the measures taken to resolve and prevent them, and
- ❖ in case your personal data are transferred, the legal basis and the recipient of the data transfer.

We will respond within the shortest possible period after submitting the request, that is within 15 days (but no later than within 1 month). Such information is free, except in case you submitted request for information in the same year regarding the same set of data. Any cost reimbursement that has already been furnished shall be repaid in case the data have been processed in an illegal manner, or the request for information resulted in rectification. Providing such information may only be refused in cases specified by legislation, indicating the relevant legal regulation, and providing information on judicial remedy or the possibility of seeking advice from the authorities.

Our Company will notify you – and all recipients to whom the data had been previously transferred for data processing – about the rectification, blocking, marking or erasure of your personal data, except when the lack of such notification does not affect your legitimate interests.

In case we fail to fulfill your request for rectification, blocking or erasure, we will inform you of the reasons for the rejection, and we will inform you about the available judicial remedies or the possibility of seeking advice from authorities within 15 days after the request was received (but no later than within 1 month) in writing or – with your consent – electronically.

In case you object to the processing of your personal data, we will inspect the case and within the shortest possible period after submitting the request, that is within 15 days (but no later than within 1 month), we will inform you about our decision in writing. If it is decided that your objection is justified, the data processing shall be terminated – including further data collection and transmission – block the data involved and notify all recipients to whom any of these data had previously been transferred concerning the objection and the ensuing measures, upon which these recipients shall also take measures regarding the enforcement of the objection.

The request is refused if we demonstrate that there are compelling legitimate grounds for the data processing which override your interests, rights and freedoms or the establishment, exercise or defense of legal claims. If you disagree with our decision, or we fail to meet the respective deadline, you shall have the right to turn to court within 30 days following the last day of the deadline.

At the data subject's own discretion, the data protection proceedings may as well be initiated at the tribunal court at the address or temporary place of residence of the data subject. A foreign national may also turn to the competent supervisory authority of his/her place of residence.

You are requested to contact our Company before lodging a complaint at the supervisory authority or the court of justice, in order to consult and to resolve the problem as quickly as possible.

8. What are the major laws governing our operations?

- ✦ Regulation 2016/679 of the European Parliament and of the Council on the processing of personal data of natural persons (GDPR)
- ✦ Act CXII of 2011 on informational self-determination and the freedom of information
- ✦ Act V of 2013 on the Civil Code
- ✦ Act CVIII of 2001 on certain issues concerning on electronic commerce and on information society services
- ✦ Act C of 2003 on electronic communication
- ✦ Act CLV of 1997 on consumer protection
- ✦ Act CLXV of 2013 on complaints and public interest disclosures .
- ✦ Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities

9. Amendment of the data processing policy

Our company shall reserve the right to amend this Data Processing Policy, and shall inform the affected parties appropriately. Information relating to data processing shall be published at the website <http://detcom.hu/privacypolicy.pdf>

Debrecen, 01. June 2018