

# **INFORMATION ON DATA MANAGEMENT, DATA PROTECTION**

## **for contracting entities and prospective partners (buyers, suppliers, subcontractors) registering on the website (<https://calv.us>)**

The purpose of the present information and regulations of Calvus Communications Ltd. is to comply with the legal requirements of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Info tv.) and the Regulation of the European Parliament and of the Council (EU) 2016/679 [GDPR] (27.04.2016. ), inform the data subjects of the scope of their personal data processed by the controller referred to in point 2, the purposes and means of the processing and any other facts relating to the processing of the data, in particular, but not limited to, their rights in relation to the processing and the legal remedies available to them.

### **1. Basic concepts**

#### **1.1. Concerned party**

The contact person of the Company registering on the website (<https://calv.us>), requesting an offer, potential customer, subcontractor, or supplier.

#### **1.2. Data processing**

Any operation or set of operations performed on personal data or data files, whether automated or non-automated, such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

#### **1.3. Personal data**

Any information relating to the Identified or Identifiable Party; 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 one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

### **2. Data Controller and Contact Information**

- Name: Calvus Communications Ltd.
- Address: 1134 Budapest, Róbert Károly körút 41.
- Legal representative: Dániel Bartha, Managing Director (executive officer)

The designation of a data protection officer at our company is not mandatory under regulations or laws. In charge of data processing, data collection, and data protection:

- Tolnay-Knefely György, CEO – tel: (20) 392 8776, email: [gyorgy.tk@calv.us](mailto:gyorgy.tk@calv.us)

### **3. Scope of processed data, purpose, legal basis, recipients, and duration of data storage**

According to Appendix 1 of this notice.

### **4. Source of personal data**

The processed personal data are provided by the Concerned Party themselves or by the Contracting Party through registration on the website (<https://calv.us/>) or by contacting us.

## **5. Rights of the Concerned Party**

The Data Controller processes personal data with respect to the following rights of the Concerned Party:

### **5.1. Right of access**

At any time, the Concerned Party has the right to obtain information from us about whether their personal data is being processed and, if so, they have the right to access their personal data stored by us and to request a copy or information on how we handle their personal data.

### **5.2. Right of rectification**

The Concerned Party has the right to request us to promptly rectify or correct any inaccurate or incomplete personal data upon their request.

### **5.3. Right to erasure ("right to be forgotten")**

The Concerned Party may request the prompt erasure of certain personal data held by us if:

- We no longer need the data for the purposes they were collected or processed;
- The processing was based on the Concerned Party's consent, and they withdraw that consent, and there is no other legal basis for the processing;
- The processing is based on our legitimate interests or those of a third party, but the Concerned Party objects to the processing, except for direct marketing purposes, and there are no overriding legitimate grounds for the processing;
- The personal data has been unlawfully processed; or
- Erasure is required to comply with a legal obligation under applicable law.

We are not obliged to erase data in all cases according to Article 17(3) of the GDPR, especially if processing is necessary for the establishment, exercise, or defense of legal claims.

### **5.4. Right to restriction of processing**

The Concerned Party has the right to request the restriction of their personal data processing if:

- The accuracy of the personal data is contested by the Concerned Party, and we need to verify the accuracy of the data during the verification period;
- The processing is unlawful, but the Concerned Party opposes erasure and requests the restriction of their use;
- We no longer need the personal data for processing purposes, but the Concerned Party requests them for the establishment, exercise, or defense of legal claims; or
- The Concerned Party has objected to processing pending the verification of whether our legitimate grounds override those of the Concerned Party.

During the restriction period, processing operations – excluding storage – can only be performed with the Concerned Party's consent, or for the establishment, exercise, or defense of legal claims, the protection of the rights of another natural or legal person, or reasons of important public interest within the EU or a Member State. We will inform the Concerned Party in advance of lifting the restriction.

### **5.5. Right to data portability**

The Concerned Party may request us to provide the personal data they have provided to us, based on their consent or under a contract, in a structured, commonly used, and machine-readable format, and have the right to transmit this data to another data controller if technically feasible. If the exercise of the right to data portability adversely affects the rights and freedoms of others, we may refuse the request to the extent necessary.

### **5.6. Right to object**

If the processing of personal data is based on our legitimate interests or those of a third party, the Concerned Party has the right to object to the processing. In such a case, we will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the Concerned Party, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

### **5.7. Right to lodge a complaint**

If the Concerned Party believes that the processing of their personal data violates applicable data protection laws, they have the right to lodge a complaint with the National Data Protection and Freedom of Information Authority. The contact information for the National Data Protection and Freedom of Information Authority is as follows: Website: <http://naih.hu/>; 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](mailto:ugyfelszolgalat@naih.hu).

The Concerned Party also has the right to lodge a complaint with the supervisory authority in the EU Member State where they have their habitual residence, place of work, or the place of the alleged infringement. Additionally, the Concerned Party may seek legal remedies in court if their rights under the GDPR have been violated. Legal actions against us, as a data controller based in Hungary, may be brought before the courts in Hungary, or according to Article 22(1) of the current Info Act, before the courts of the Concerned Party's place of residence. The contact information for the courts in Hungary can be found on the following link: <http://birosag.hu/torvenyszekek>. As we are not exercising public authority as a public body, the Concerned Party may also bring the case before the courts of their habitual residence, where they believe the alleged infringement occurred.

### **6. Profiling**

We do not perform automated decision-making or profiling in the processing of personal data concerning the Concerned Party.

### **7. Data Security**

The Data Controller undertakes to ensure the security of personal data and takes technical measures to ensure that the processed personal data is protected against unauthorized access, destruction, alteration, or use.

**Information notice for registering contracting authorities, prospective partners (buyers, suppliers, subcontractors)**

**Our Company processes the following personal data of the data subject who registers on the website, for the purposes, on the legal basis and for the duration specified herein:**

<b>The scope of processed data.</b>	<b>Purpose of data processing.</b>	<b>The legal basis of data processing.</b>	<b>Recipient of data transfer.</b>	<b>Duration of data storage.</b>
Name E-mail address Phone number	The purpose of data processing includes sending offers, facilitating contract conclusion, establishing contact, recording, storing, using, and deleting data in an electronic database.	Based on legitimate interest according to GDPR Article 6(1)(f): Establishing and maintaining partner relationships, facilitating potential contract conclusion, providing offers. For the performance of a contract according to GDPR Article 6(1)(b). With voluntary consent according to GDPR Article 6(1)(a).Calvus Communications Kft. Data processors involved in data processing (Point 2).	- Calvus Communications Kft. - Data processors involved in data processing (Point 2).	- In the case of a successful request for an offer or contract, the data will be stored according to the rules related to contract conclusion. - In the case of rejection of the offer, data will be stored for 3 months following the date of rejection. - If no response is received to the offer, data will be stored for 3 months from the expiration of the offer's validity.