

1. The purpose of the Data Handling Notice .....	2
2. Data of the Data Controller .....	2
3. The scope of the personal data handled .....	3
3.1 Cookies .....	3
3.1.2 Mandatory session cookies .....	3
3.1.3 Third party cookies (analytics).....	4
3.1.3.1. Third party cookies for analytics .....	4
3.1.3.2 Third party cookies for marketing (Google Adwords, Facebook) .....	4
3.1.2 Acceptance of cookies .....	4
3.2 Personal information to be provided .....	4
3.2.1 Personal data at the website .....	4
3.2.2 <b>Personal data for Contact</b> .....	5
3.2.3 <b>Personal data for Newsletter subscription</b> .....	5
3.2.4 <b>Personal data for Requests</b> .....	5
3.2.5 Scheduled storage and retention time for handled data .....	6
3.2.6 Technical details .....	6
4. The purpose, method and legal basis of data handling .....	6
4.1 General Data Handling Policies .....	6
5. Physical storage locations of the data.....	7
6. Data transmission, data processing, the circle of the authorized personnel who can have access to the data .....	7
7. The rights of the person concerned and the possibilities for the enforcement of these rights .....	8
7.1 Rights of information.....	8
7.2 Rights to access .....	8
7.3 Rights to rectification .....	8
7.4 Rights to erasure .....	8
7.5 Rights to restriction of processing.....	9
7.6 Rights to data portability.....	9
7.7 Rights to object.....	10
7.8 Automated individual decision-making, including profiling.....	10
7.9 Rights to withdraw consent.....	10
7.10 Rights to turn to the court.....	10
7.11 Data Protection Board .....	10
8. Other policies .....	11

# Data Protection Notice

---

## *1. The purpose of the Data Handling Notice*

Access assessment Ltd. (1024 Budapest, Keleti Károly street 9. VI. floor 9., hereinafter referred to as provider, data controller) as a data controller agrees to the contents of this legal notice. SHL Hungary Ltd. ensures, that all data management related to its business activity complies with the requirements of this notice and the applicable national legislation and the legal acts of the European Union.

Data privacy policies related to the data management of access assessment Ltd. are continuously available at [www.accessassessment.hu](http://www.accessassessment.hu)

Access assessment Ltd. reserves the right to change this notice at any time. Of course, the audience will be notified in due time of any changes.

If you have any questions about this announcement, please write to us and our colleague will answer any arising questions.

Access assessment Ltd. is committed to protecting the privacy of its clients' information and considers the respect of their clients' right of informational self-determination as particularly important. Access assessment Ltd. handles personal data confidential and will take all security, technical and organizational measures that guarantee the security of the data. Access assessment Ltd. describes its data handling practices below.

## **2. Data of the Data Controller**

If you want to contact our company, contact the data controller at [support@accessassessment.hu](mailto:support@accessassessment.hu)

Access assessment Ltd. stores all received e-mails, including personal data, until the personal withdrawal request of the information provider.

Name: Access assessment Ltd.

Head office: 1024 Budapest, Keleti Károly street 9. VI. floor 9.

Company Register: 01-09-974829

Name of the registration court: Company Registry Court of Budapest

Environs Regional Court

Tax number: 14642948-2-41

Phone number: +36 23/703 002

E-mail: [support@accessassessment.hu](mailto:support@accessassessment.hu)

Data storage:

Macroweb Internet Consulting Kft

1213 Budapest, Páfrányos út. 15.

## **3. The scope of the personal data handled**

Access assessment Ltd. collecting three type of data from it's website and only with the permission of the page visitors. The acceptance of the data colleting - which can be varied by the data types - and the present data protection notice can be done at the website.

Types of the collected data:

- Mandatory session cookies

The purpose of these cookies is to enable visitors to browse the access assessment Ltd. website in full and smooth, to use its features and the services available there.

- Third party analytical cookies

Access assessment Ltd. applies Google Analytics, Adwords and Facebook cookies as a third party cookie on its website. Using thosefor statistical and marketing purposes, Access assessment Ltd. collects information about how visitors use web pages.

- Personal data

Access assessment Ltd. also collects personal data at it's website, to create the oportunity for the browsers to attain information and to get in contact with the firm.

### **3.1 Cookies**

#### **3.1.1 The cookies' purpose**

to collect information about visitors and their assets,

for statistical and marketing purposes of data collecting,

to facilitate the use of the website,

to provide a quality user experience.

For a tailor-made service, it places a small packet (a so called cookie) on the user's computer and reads it during later visits. If your browser returns to a previously saved cookie, the cookie operator can link the user's current visit with the past one, but only for their own content.

#### **3.1.2 Mandatory session cookies**

The purpose of these cookies is to enable visitors to browse the access assessment Ltd. website in full and smooth, to use its features and the services available there. The duration of this type of

cookie expires until the session (browsing) ends, and by closing the browser, this type of cookies is automatically deleted from the computer or other device used for browsing.

### 3.1.3 Third party cookies (analytics)

#### *3.1.3.1. Third party cookies for analytics*

The Access assessment Ltd.applies Google Analytics as a third party cookie on its website. Using Google Analytics for statistical purposes, Access assessment Ltd.collects information about how visitors use web pages. The data is used to improve the site's development and user experience. These cookies will remain on your computer or on your other browsing device until they expire, or until the visitor cancels them.

#### *3.1.3.2 Third party cookies for marketing (Google Adwords, Facebook)*

The Access assessment Ltd.applies Facebook and Google Adwords as third party cookies on its website for marketing purposes and so for the quality development and sustenance of the firms products and services. These cookies will also remain on your computer or on your other browsing device until they expire, or until the visitor cancels them.

### 3.1.2 Acceptance of cookies

Cookies at the website of access assessment Ltd. collecting data in case of the users approval.

The approval becomes valid with the acceptance of the cookies data collecting. The users may declare their approval of the cookies and their data collecting at the webpage (and also which purposes of the cookies would be approved and which's are not), which declaration can be modified any time at the users browser.

## **3.2 Personal information to be provided**

### 3.2.1 Personal data at the website

Access assesement collecting the following personal data types at its website ([www.accessassessment.hu](http://www.accessassessment.hu)). Giving of personal data is voluntary and used to help contact, newsletter subscriptionand other requests processes.

- **Contact** (<https://www.accessassessment.hu>): Name \*, Company name\*, Email \*, Phone Number \*, Remark
- **Newsletter subscription** (<https://www.accessassessment.hu>): e-mail \*, Name
- **Request for proposal** (<https://www.accessassessment.hu>): Name \*, Company name \*, E-mail \*, Phone number \*, Remark\*

**\* = required fields**

### **3.2.2 Personal data for Contact**

The visitors of the website have the opportunity to get in contact with access assessment Ltd. at its website. For contact purposes the following data have to be provided:

- Name
- Company name
- E-mail
- Phone number
- Remark

Above that also the present Data Protection Notice should be approved for the contact to be created.

### **3.2.3 Personal data for Newsletter subscription**

The visitors of the website have the opportunity to subscribe for the newsletter of the access assessment Ltd. at its website. For newsletter subscription the following data have to be provided:

- Name
- E-mail

Above that also the present Data Protection Notice should be approved for the contact to be created.

Subscription available here: [www.accessassessment.hu](http://www.accessassessment.hu).

For un-subscribing, write an e-mail to the address at the bottom of any newsletter, for deletion of your subscription.

All of the sub and un-subscriptions can be cancelled at any time.

### **3.2.4 Personal data for Requests**

The visitors of the website have the opportunity to request proposal from access assessment Ltd. at its website. For request purposes the following data have to be provided:

- Name
- Company name
- E-mail
- Phone number
- Remark

Above that also the present Data Protection Notice should be approved for the contact to be created.

### 3.2.5 Scheduled storage and retention time for handled data

Data Type	Storage	Retention time
Contact	Inner Storage	5 years or withdrawal request
Newsletter		
Request proposal		

### 3.2.6 Technical details

Access assessment Ltd. selects and operates the IT tools used to manage personal data in the provision of the service so that the processed data

- is available to the authorized person (availability),
- its authenticity and authentication (credibility of data handling),
- is unchanged, which fact can be verified (data integrity),
- is protected against unauthorized access (confidentiality of data).

Access assessment Ltd. protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction and accidental destruction.

Access assessment Ltd. provides technical, organizational and institutional measures to protect the security of data handling, providing a level of protection that meets the risks associated with data handling.

Access assessment Ltd. while handling data preserves the following:

- confidentiality: it protects the information so that it can only be accessed by those who are entitled to it,
- integrity: it protects the accuracy and completeness of the information and processing method,
- availability: ensures that when the eligible user needs it, you can actually access the information you need and have the tools associated with it available to you.

## 4. The purpose, method and legal basis of data handling

### 4.1 General Data Handling Policies

The data handling of the activities of Access assessment Ltd. is based on voluntary consent or legal authorization. In the case of data handling based on voluntary contributions, the data providers may withdraw their consent at any time during the processing of data.

In some cases, the handling, storage, and transmission of a particular set of data is mandatory by law, which we will notify our customers separately.

Access assessment Ltd. is obliged to inform the data providers that, if they do not provide their own personal data, it is the data provider's obligation to obtain the consent of the person concerned.

The data handling principles of Access assessment Ltd. are in line with current legislation on data protection, in particular:

Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, Regulation (EU) 2016/679 of the European Parliament and of the Council (of 27 April 2016) 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 (General Data Protection Regulation, GDPR)

Act V of 2013 on the Civil Code; Act C of 2000 on Accounting,

Act LIII of 2017 on Prevention and Combating of Money Laundering and Terrorist Financing (Anti-Money Laundering Act),

Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises.

## **5. Physical storage locations of the data**

Your personal information (that is, the data that may be associated with you) can be treated in the following way: on the one hand, technical data on your computer, browser, web address, visited pages, on the other hand, you may also provide your name, contact details or other information if you intend to contact us personally using this site.

Technically recorded data during the operation of the system: the data of the computer of the person concerned recorded by the system of Access assessment Ltd. as an automatic result of the technical processes. Data that is automatically recorded will be logged automatically when entering or exiting, without the particular statement or action of the person concerned. This data cannot be linked to other personal user data except in cases that are legally binding. Only Access assessment employees have access to the data.

## **6. Data transmission, data processing, the circle of the authorized personnel who can have access to the data**

Only natural persons in contractual employment with Access assessment Ltd.

## **7. The rights of the person concerned and the possibilities for the enforcement of these rights**

You may request information about the handling of your personal data and you may request the rectification of your personal data or, with the exception of mandatory data, cancellation, revocation, and you may practice your right to data portability and to object the a way it was indicated by the time of the recording of the data or on the above mentioned contact details of the data controller.

### **7.1 Rights of information**

Access assessment Ltd. shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

### **7.2 Rights to access**

The data subject is entitled to receive feedback from the data controller as to whether his or her personal data is being processed and, if such data is being processed, the data subject is entitled to have access to the personal data and to the following information: the purpose of data handling; the categories of personal data concerned; the categories of recipient or recipients with whom or which personal data will be communicated or has been already communicated, including in particular third-country addresses or international organizations; the intended period for which the personal data will be stored; the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing; the right to lodge a complaint with a supervisory authority; from which source the personal data originate,; the fact of automated decision making, including profiling, as well as the logic used and the understandable information on the significance of such data management and the likely consequences for the data subject. The data controller shall provide the information within a maximum of one month from the submission of the application.

### **7.3 Rights to rectification**

The person concerned may request the rectification of inaccurate personal data handled by Access assessment Ltd. and the completion of incomplete data.

### **7.4 Rights to erasure**

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and Access assessment Ltd. shall have the obligation to erase personal data without undue delay where one of the following grounds applies:



the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;

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

the personal data have been unlawfully processed;

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

the personal data have been collected in relation to the offer of information society services.

Data erasure is not applicable if the processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; for reasons of public interest in the area of public health; for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes or for the establishment, exercise or defence of legal claims.

## **7.5 Rights to restriction of processing**

The data subject shall have the right to obtain from Access assessment Ltd. restriction of processing where one 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 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 controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

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

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed 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 or for reasons of important public interest of the Union or of a Member State.

## **7.6 Rights to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

## **7.7 Rights to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, where processing is carried out for the performance of a task carried out in the public interest or in the exercise of official authority, or for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

## **7.8 Automated individual 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 concerning him or her or similarly significantly affects him or her.

## **7.9 Rights to withdraw consent**

The person concerned has the right to withdraw his consent at any time.

## **7.10 Rights to turn to the court**

In case of breach of the rights of the data subject, the data subject may turn to the court. The court proceeds with special priority.

## **7.11 Data Protection Board**

You can complain to The Hungarian National Authority for Data Protection and Freedom of Information:

Name: The Hungarian National Authority for Data Protection and Freedom of Information

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Pf.: 5.

Telephone: 0613911400

Fax: 0613911410

## **8. Other policies**

Data handling not listed in this information is provided when data is being recorded.

We inform our clients that we may give information, dissemination, or transfer documents or other forms, based on the authorisation of the court, the prosecutor, the investigating authority, the offense authority, the administrative authority, The Hungarian National Authority for Data Protection and Freedom of Information, the National Bank of Hungary or other bodies under the authority of the law.

Access assessment Ltd. - to the authorities - if the authority indicates the exact purpose and the scope of the data - issues personal data only and to the extent necessary for the purpose of the request.