

Privacy Notice

Issued by Mantra Communication Ltd.

January 1, 2021

Browsing www.mantracomm.hu website and giving consent for cookies also means getting to know and accepting the following terms and conditions.

1. Data controller

Name of data controller: Mantra Communication Limited Company (hereinafter Company)

Company registration number: 01 09 939310

Registered seat: 1066 Budapest, Teréz körút 8. 1/14A, Hungary

Represented by: Eszter Kiss Managing Director

E-mail address: info@mantracomm.hu

Website: www.mantracomm.hu

Web hosting service: Tárhely.Eu Szolgáltató Kft.

Seat of web hosting service: 1144 Budapest, Ormánság u. 4., Hungary

Domain provider: Totalnet Bt.

Seat of domain provider: 2626 Nagymaros, Szív utca 8., Hungary

2. General rules of data management

This Privacy Notice is valid from January 1, 2021 until revoked.

Definitions in this document are used according to Act CXII. of 2011 as follows:

- Data subject: any natural person identified or identifiable by any information.
- Personal data: 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.
- Consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear

affirmative action, signifies agreement to the processing of personal data relating to him or her.

- Data controller: the natural or legal person, public authority, agency or 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- Data processing: any operation or set of operations which is performed on 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 by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- Data processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- Data transfer: making the data available for a specific third party.
- Third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- Personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

3. Principles of data processing

The data processing activities of the Company are carried out in accordance with the current legal regulations with the aim to ensure the accuracy of the data in a legal and trustworthy way at all stages of data processing, and to ensure the protection of the personal data of the data subject in case of unauthorized access, alteration, transmission, erasure or destruction. The Company's data protection system is overseen by the Managing Director.

- Purpose limitation

Personal data are collected for specified, explicit and legitimate purposes and not further processed in a way that is incompatible with the purposes.

- Legal, trustworthy and transparent proceedings

Data are processed by the Company in a legal, trustworthy and transparent way in relation to the data subject.

- Data minimisation

Personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

- Accuracy

Personal data are processed in an accurate way and they are kept data up to date (if necessary).

- Storage limitation

Personal data are kept by the Company in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

- Integrity and confidentiality

The Company ensures appropriate security of the personal data, including protection against unauthorised or illegal processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4. Purposes of data processing

Purposes of data processing are:

- fulfilment of orders within the scope of the Company's services,
- identification of third parties involved in the execution of orders, contact with these persons, communication, preparation / conclusion of agreements,
- concluding, performing and settling contracts with persons involved in or facilitating the activities of the Company,
- commission fee and cost accounting, invoicing,
- registration of orders, management of documents arising in connection with orders, and
- fulfilment of employer's obligations.

5. Data processing related to website visits

By visiting the www.mantracomm.hu website, you consent to the use of cookies applied on the website to improve the browsing experience.

The www.mantracomm.hu website automatically records IP address of the user's computer, starting time of the visit, type of the browser and operating system (depending on the user's computer settings). The data thus recorded are not allowed to be combined with other personal data. The Company will not sell, rent or otherwise distribute the information collected by cookies to third parties, except to the extent necessary to provide the services for which the data subject has provided this information in advance and voluntarily.

Data processing is for statistical purposes only and will help the Company, as the operator of the website, to tailor the services of the website to the expectations of the users. To this end, the Company may analyse the use of the website.

The Company uses the Google Analytics system to examine the visitors' habits showed up during the visit to the www.mantracomm.hu website, time of data retention is unlimited. Visitors can unsubscribe from Google Analytics at the following link: <https://tools.google.com/dlpage/gaoptout>.

If the Company displays various content on the website using external web services, this may result in the storage of some cookies that are not controlled by the Company, so it has no influence on what data are collected by these websites or external domains. These cookies are described in the regulations for the given service.

Users can manage cookie settings in their browser. For detailed information support please visit www.aboutcookies.org.

Types of data processing related to website visits

Name of data processing	Purpose	Legal ground	Duration of storage
Contact (Messages sent to the e-mail address of the data processor available on the website)	Response, submission of business offers	Process and answer incoming queries addressed to the data controller	Until the purpose is fulfilled
Application for a job by sending an e-mail to the address available on the website	Filling a job vacancy	Contact job applicants for the purpose of a personal meeting	5 years
Session cookies	Website development	Improve user experience and comfort	During the visit
Functional cookies	Statistical analysis	Collect and store data by third party (Google Analytics) to support development and effective operation of the website	As long as the data is relevant

6. Rights of data subjects

- Right of access

Information may be requested about what data we process, for what purpose, for how long, to whom we pass them on, where the data we process come from.

- Right to rectification

If your data change or we have recorded them incorrectly, you may request that your data be rectified, corrected or clarified.

- Right to erasure

In the cases specified by law, you may request that the data we process be deleted.

- Right to restriction of processing

In the cases specified by law, you may request that the data processing be restricted.

- Right to object

In the case of data processing based on a legitimate interest, you may object to the processing of your data, in which case your data will not be further processed.

- Right to data portability

You may request the porting of your data, in the exercise of which right you may request that we provide you with the type of data specified by law, or, based on a relevant special request or authorisation by you, transfer them directly to another service provider designated by you, if technically feasible.

- Right to withdraw consent

When we process your data based on your consent, you have the right to withdraw your consent at any time, which, however, does not affect the lawfulness of our data processing prior to the withdrawal of your consent.

Requests related to the rights of data subjects should be sent by post to the registered seat and office of the Company (1066 Budapest, Teréz körút 8. 1 / 14A, Hungary). If an application is submitted, we will inform you within 25 days about the measures taken under the legislation.

Data subjects have the right to lodge a complaint to the competent supervisory authority if their rights have been impaired in connection with data processing:

Name of the authority: National Authority for Data Protection and Freedom of Information

Website: www.naih.hu

Postal address: 1530 Budapest, Pf.: 5., Hungary

E-mail: ugyfelszolgalat@naih.hu

Phone: +36 (1) 391-1400

The data subject may, at his / her choice, also pursue his / her claim related to an alleged violation of the law in court. The trial falls within the jurisdiction of the tribunal.

7. Confidentiality

Mantra Communication Kft. ensures that the personal data processed by it is not accessible, acquainted, changed or destroyed by an unauthorized person. The Company treats all business secrets that come to its knowledge in accordance with the applicable legislation.

8. Personal data breach

In the case of a personal data breach the Company acts according to the European General Data Protection Regulation and not later than 72 /seventy-two/ hours after having become aware of the incident it shall notify the personal data breach to the data protection authority and the data subjects unless the personal data breach is unlikely to result in a risk to the rights of natural persons.

Mantra Communication is entitled to unilaterally amend this Privacy Notice.

Privacy Notice is published on the Company's website at www.mantracomm.hu.