

Privacy Policy

ANVERT LTD.



2424 February 2021

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attorney

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1. Introduction

Anvert Limited Liability Company (seat: 6725 Szeged, Moszkvai boulevard 23. III. floor 15., hereinafter referred to as "**Anvert Ltd.**" or "**data controller**") provides software services to its customers and partners that operate corporate e-communication analytics systems.

As a data controller, Anvert handles your personal data (hereinafter referred to as "**data subject**", or "**you**") according to the provisions of the present privacy policy (hereinafter referred to as "**privacy policy**" or "**policy**"). The data processing and management of Anvert complies with the provisions of the current applicable legislation and this privacy policy.

If certain parts of these Terms and Conditions are incomprehensible or if you have any questions, please feel free to contact us at the contact details provided in the Contact section of this privacy policy to answer your questions.

Anvert manages your personal data solely for the purposes of data processing and data processing specified in this privacy policy. We process your personal data only to the extent, for the duration and in the manner required which is necessary for providing our services, because we consider your privacy and the right to information self-determination to be paramount. In order to keep your data safe, Anvert takes all necessary and available security measures both in technical and in the process of the persons involved in data processing and data processing.

This privacy policy describes the details and rules of data processing and management of Anvert Ltd., which are applicable to both data controllers and partner data processors involved in data processing.

Anvert Ltd. processes the above personal data primarily to accomplish contracts with its partners and customers. In the course of the processing of your personal data, the data controller is Anvert Ltd.

'Data Controller' means a natural or legal person who defines the purposes and means of the processing of personal data independently or with others.

In the data processing implemented by Anvert several parties participate. In connection with the data processing, Anvert may use the help of other companies to implement the data processing goals (eg. bookkeeping, immigration and residency services etc.). In this case, the affiliate partner participates in the processing of your personal data as a data processor.

'Data Processor' means the natural or legal person who processes personal data on behalf of the controller and usually only executes instructions or orders, and does not make decisions about data processing, or the data processor doesn't determine the means of data processing.

Anvert Ltd., as the data controller is responsible for the data processing to the clients. The data processor is only liable for damages, if he has breached the rules applicable to the data processor or has not followed the lawful instructions of the data controller. The data controller

is solely responsible for the errors committed by the controller. Accordingly, Anvert receives your personal data directly from you.

You have the right to protest against the data processing

As a data subject, you have the right to protest against the processing of your personal data at any time for reasons related to your own situation. In this case, the data controller, which is Anvert Ltd., may not further process your personal data, unless the data controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject or reasons which related to the validation or protection of legal claims.

Legal basis for data processing

Processing your personal data is necessary to fulfill the contractual obligation between you and Anvert Ltd. Your personal information will only be processed in connection with the performance of the contract.

The processing of personal data is lawful under Article 6 (1) (b) of the GDPR if the processing is **necessary for the performance of a contract** in which the data subject is required to take action at the request of one of the parties prior to the conclusion of the contract; and CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services Act 13 / A. §, the data controller is entitled to handle personal data in connection with data processing.

The legal basis for enforcement is Article 6 (1) (f) of the GDPR, according to which **data processing is necessary for the legitimate interests of the controller or a third party**, unless the interests or fundamental rights and freedoms of the data subject have priority over those interests, which require the data processing, especially if the child concerned is concerned.

Who can access the data subject personal data

The personal data of the customers and partners defined above can be accessed by Anvert Ltd. and its employees. In addition, the following data processors have access to your personal data:

Server provider

Name of Data processor: Rackforest Ltd.

Seat of Data processor: 1132 Budapest, Victor Hugo street 18-22. 3. floor 3008.

and

Name of Data processor: DigitalOcean LLC

Seat of Data processor: 101 Avenue of the Americas, 10th Floor New York, NY 10013

Whether the data subject is obliged to provide his / her personal data

You are not obliged to provide your personal data concerning the use of Anvert Ltd's services. However, if you do not provide these personal information, you will not be able to use the services of Anvert Ltd.

Data management and storage time

The personal data of the customers and partners are handled during the term of the contract with Anvert Ltd. Upon termination of the contract, Anvert Ltd. may process the personal data necessary for the enforcement of its legitimate interests. Based on this, your personal data can be processed for a general limitation period of 5 years in order to be able to assert the legitimate interests of Anvert Ltd. in connection with your mandate.

Transfer of personal data to a third country

The personal data of the customers and partners will not be transferred to a third country. In a third country, we mean countries that are not members of the European Union.

Automated decision making and profiling

Our company does not perform profiling. However in the context of the above data processing, profiling is being realized through third parties.

"**Profiling**" means any form of automated processing of personal data that involves the personal data of a person to assess certain personal characteristics, in particular performance at work, economic situation, health, personal preferences, interest, reliability, behavior, location or movement used to analyze or predict related features.

The purpose of profiling is to offer our products that are more interesting and important to you. We can provide you with products that are better adapted to your buying habits. Profiling is only about buying habits and preferences. Profiling does not have any adverse consequences or restrictions for you.

Google: Anvert Ltd. uses the services of **Google LLC. Google Analytics, Google LLC. Youtube and Google LLC. DoubleClick** on website. Google LLC. uses cookies to help analyze the use of the website. The primary purpose of this is to search for offers that are more relevant to your interests. To do this, we need to be able to analyze our website activities with Google.

The information stored by the cookie (including the user's IP address) is stored by Google LLC. on its US servers. Google LLC. may transfer the collected information to third parties, if required by law, or by third parties to Google LLC. process the information. The privacy policy of Google LLC. is available at <http://www.google.com/intl/en/policies/privacy/>.

You may find more information on the data processing, use of cookies, etc. of Google LLC. on Google LLC.'s website below: <http://www.google.com/intl/en/policies/privacy/ads/>.

You can change your Google data processing settings here:
<https://privacy.google.com>.

Anvert Ltd uses the services of Inspectlet, to monitor and store customer behaviors on the site for analyzing purposes to improve the customer satisfaction on the site.
<https://www.inspectlet.com/>

2.2. Data processing of Anvert Ltd. concerning invoicing and accounting

The purpose of data processing

Anvert Ltd. is obliged to issue invoices to its clients for the value of the services used in accordance with the effective legislation. In connection with billing, Anvert Ltd. processes the billing information of the clients. The purpose of this data processing is to ensure that Anvert Ltd. complies with its legal obligation to issue an accounting document on economic events.

Expected impact of the data processing on clients (data subjects)

For clients, the data processing does not produce any particular impact or carry any outstanding risk. The data processing is required on the basis of an order by a client to Anvert Ltd.

Data controller and its contact details

For the purposes of the above data processing the data controller is Anvert Ltd.

Seat and mailing address: 6725 Szeged, Moszkvai boulevard 23. III. floor 15

E-mail :info@anvert.com

Phone: +36 20 392 7326

web: www.anvert.com

Representative of Anvert Ltd.: FÁTH Ákos managing director

E-mail: info@anvert.com

The range and type of persons, stakeholders involved in data processing

The type of persons involved in the data processing are the clients of Anvert Ltd. who use the services of Anvert Ltd. From the point of view of the data processing, the person is called "data subject" whose personal data is being processed. In this data processing, stakeholders are typically clients, who use the services of Anvert Ltd.

Processed personal data

Your personal information below is processed by Anvert Ltd. for invoicing, accounting and bookkeeping purposes:

personal identification data	client's name, address, tax number
contact data	e-mail, phone number

In addition to the personal data listed above, all the data necessary to continue the communication required for invoicing and accounting is being processed.

Legal basis for data processing

The data processing is necessary to fulfill the legal obligation of the data controller required by law.

Who can access the client's personal data

Primarily the personal data of the client defined above can be accessed by Anvert Ltd..

In addition, the following data processors may access the personal data of the clients as defined above:

Server provider

Name of Data processor: Rackforest Ltd.

Seat of Data processor: 1132 Budapest, Victor Hugo street 18-22. 3. floor 3008.

and

Name of Data processor: DigitalOcean LLC

Seat of Data processor: 101 Avenue of the Americas, 10th Floor New York, NY 10013

Invoicing

Name of Data processor: KBOSS.hu Ltd.

Seat of Data processor: 1031 Budapest, Záhony street 7.

website: <https://www.szamlazz.hu/szamla/main>

Bookkeeping

Name of Data processor: TABULA RASA CONSULTING Bt.

Seat of Data processor: 6725 Szeged, Cserepes row 9. building A.

We may forward your personal data to the National Tax and Customs Authority on the basis of a statutory provision.

Whether the client (data subject) is obliged to provide his / her personal data

The client is required to provide the necessary information of the invoices to be issued in connection with the order, as the obligation to issue an invoice is required by law.

Data processing and storage time

Pursuant to Section 169 (1) - (2) of Act C of 2000 on Accounting, the retention period of the invoice and the data necessary for its issuance is 8 years.

Transfer of personal data to a third country

The personal data of the data subject will not be transferred to a third country. In a third country, we mean countries that are not members of the European Union.

Automated decision making and profiling in data processing

The processing of client's data does not result in automated decision making or profiling.

2.3. Anvert Ltd.'s data processing related to complaint handling

The purpose of data processing

Anvert Ltd.'s commercial activity requires data processing in order to deal with your complaint against the services of Anvert Ltd. Anvert Ltd. must investigate your complaint and inform you of its outcome. In this regard, we handle your personal information to handle your complaint.

Expected impact of the data processing on clients (data subjects)

For the client, this data processing does not produce any particular effect or carry any outstanding risk. Data management is necessary for handling the complaint of the client using the services of Anvert Ltd.

Data controller and its contact details

For the purposes of the above data processing the data controller is Anvert Ltd.

Seat and mailing address: 6725 Szeged, Moszkvai boulevard 23. III. floor 15

E-mail :info@anvert.com

Dr. Juhász Péter ügyvéd – <https://www.adatjog.hu>

Szerzői jogvédelem alatt áll.

The personal data of the applicants for admission for the purpose of employment are handled by Anvert Ltd. for the purpose of evaluating your application, application, CV and concluding a contract of employment with the selected candidate.

Expected impact of the data processing on clients (data subjects)

For the applicant, data processing does not produce any particular effect or carry any outstanding risk. Data processing is necessary to evaluate the registration application.

Data controller and its contact details

For the purposes of the above data processing the data controller is Anvert Ltd.

Seat and mailing address: 6725 Szeged, Moszkvai boulevard 23. III. floor 15

E-mail : info@anvert.com

Phone: +36 20 392 7326

web: www.anvert.com

Representative of Anvert Ltd.: FÁTH Ákos managing director

E-mail: info@anvert.com

The range and type of persons, stakeholders involved in data processing

Candidates for Anvert Ltd. are those who seek employment with Anvert Ltd.. From the point of view of data processing, the person is called "affected" whose personal data is being processed. In this data processing, stakeholders are typically candidates for admission.

Processed personal data

Your personal data below will be handled by Anvert Ltd.:

Personal identification data: the name of the applicant for registration, the data contained in his resume

Contact data: phone number, e-mail address of the applicant

In addition, any data that is submitted to the Data Controller during the application for registration, CV, and application is required to continue the communication required for the evaluation.

Legal basis for data processing

Processing your data is necessary to conclude an employment contract. Your personal data will only be processed in connection with the conclusion of the employment contract.

The processing of personal data is lawful under Article 6 (1) (b) of the GDPR if the data processing is **necessary for the performance of a contract** in which the data subject is required to take action at the request of one of the parties prior to the conclusion of the contract; and Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services Act 13 / A. §, the data controller is entitled to handle personal data in connection with data processing.

In addition, data processing is considered to be lawful under GDPR Preamble (44) if it is required under a contract or contract.

Who can access the client's personal data

The personal data of the person applying for admission, as defined above, may be accessed by Anvert Ltd.

In addition, the following data processors may access the personal data of the data subject as defined above:

Server provider

Name of Data processor: Rackforest Ltd.

Seat of Data processor: 1132 Budapest, Victor Hugo street 18-22. 3. floor 3008.

and

Name of Data processor: DigitalOcean LLC

Seat of Data processor: 101 Avenue of the Americas, 10th Floor New York, NY 10013

Whether the client (data subject) is obliged to provide his / her personal data

You are not required to provide your personal information. However, if you do not provide these personal information, Anvert Ltd. will not be able to evaluate your application, CV, application, and you will not be able to work with you. It is therefore in our common interest to provide the above personal information.

Data processing and storage time

Your personal data will be stored by Anvert Ltd. for 1 month after the application for registration, CV and application.

If the application for registration, CV, application is reviewed or withdrawn, Anvert Ltd. will delete your personal data within 1 month after the application, CV, application and withdrawal.

Transfer of personal data to a third country

The personal data of the client will not be transferred to a third country. In a third country, we mean countries that are not members of the European Union.

Automated decision making and profiling

The processing of the client's personal data does not result in either automated decision making or profiling.

3. Data protection rights of the clients whose personal data is being processed in the course Anvert Ltd. Technologies Ltd's data processing

As an affected person whose personal data is being processed, the following rights apply to the data processing of Anvert Ltd. Please note that you may exercise your rights below primarily against the data controller, which is Anvert Ltd.

The rights of you as a data subject in relation to the data processing

- the right to information,
- the right of access,
- the right to rectification,
- the right to erasure, "right to be forgotten",
- right to restriction of processing,
- the right to protest,
- the right to data portability,
- the right to withdraw consent,
- the right to complaint
- the right to judicial remedy.

Right to Information

General rules for informing the person concerned and right to information

The data controller shall inform the data subject in detail at the latest when the personal data of the data subject are obtained prior to the commencement of data processing. Information on data processing shall contain the notifications contained in this privacy policy.

The controller is responsible for providing prior information. In addition to the above pre-notification, you may request information from the data controller (Anvert Ltd.) at any stage of data processing as follows. In this case, the controller must provide the requested information as soon as possible, but no later than within 25 days. The 25 days deadline can only be extended in justified cases up to 2 months.

The controller may only refuse the information, if it proves that the data subject is not identifiable.

If the data controller does not take action within 25 days, ie does not comply with the obligation to provide information, it must inform the data subject of the failure to act, the reason for it and the right of the person concerned to submit a complaint or the right to judicial remedy. This privacy policy contains further information on your right to complain, and your right to judicial remedy.

The information and action shall be provided by the controller to the data subject free of charge. However, the controller may exceptionally charge a reasonable fee or refuse to provide information and action if the request of the data subject is clearly unfounded, repetitive or excessive.

Right of access

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

(a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The controller shall make available to the data subject a copy of the personal data which are the subject of the data processing. The controller may charge a reasonable fee based on administrative costs for additional copies requested by the data subject.

If the data subject has submitted the application by electronic means, the information shall be made available in a widely used electronic format, unless otherwise requested by the data subject.

Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure ('right to be forgotten')

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

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) if the legal ground for the data processing is your consent, and you withdraw the consent on which the processing is based according to point, and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing;
- (d) the personal data have been unlawfully processed;
- (e) 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;
- (f) the personal data have been collected in relation to the offer of information society services

Where the controller has made the personal data public and is obliged pursuant to the paragraph above to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing 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.

In the above cases, the data controller is not obliged to comply with the cancellation request if the data processing is necessary for the reasons below: (a) for exercising the right of freedom of expression and information; (b) 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; (c) for reasons of public interest in the area of public health; (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to above is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (e) for the establishment, exercise or defence of legal claims.

Right to restriction of processing

You (as the data subject) shall have the right to obtain from the controller restriction of processing where one of the following applies: (a) 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; (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (c) 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; (d) 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 under paragraph above, 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.

A data subject who has obtained restriction of processing pursuant to paragraph above shall be informed by the controller before the restriction of processing is lifted.

For correction or deletion of personal data or for notification obligation to limit data processing

The controller shall inform any data subject about the rectification, erasure or limitation of the data with which the personal data have been communicated, unless this proves impossible or requires a disproportionate effort.

At the request of the data subject, the controller shall inform those concerned.

Right to data portability

You 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, where: (a) the processing is based on consent (ex. Marketing newsletters); and (b) the processing is carried out by automated means.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Exercising the right to portability of data should not prejudice the right to erasure. The right to portability of data must not adversely affect the rights and freedoms of others.

Right to object

You, as the data subject 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 which is based on public interest or the reasonable interest of the controller, 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.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to withdraw consent

The data subject has the right to withdraw his / her consent to the data processing at any time, if the legal basis for the data processing is the consent of the data subject (eg sending a marketing newsletter). However, withdrawal of consent will not render the data processing prior to revocation unlawful.

4. Data security

Storage of personal data and security of data processing

The IT infrastructure, storage facilities and other data storage location of Anvert Ltd. Are located at its headquarters and other premises.

The IT tools and solutions used for data processing, especially security systems, are selected and used so that the processed personal data is accessible, credible and authenticated to authorized persons, and can be verified, protected against unauthorized access.

Your personal information is protected by appropriate measures, in particular against unauthorized access, alteration, data protection incident, data theft, data leakage, forwarding, disclosure, deletion or destruction, as well as unavailability due to accidental destruction of the technique used.

In order to protect the data files managed in its registers, Anvert Ltd. Ensures, by means of an appropriate technical solution, that the stored data - except in the case of a legal authorization - cannot be directly linked or interconnected, or assigned to the affected person.

In view of the state of the technological development, we take technical, organizational and organizational measures to ensure the security and protection of our data processing that provide an adequate level of protection for your personal data.

The IT system and network of Anvert Ltd. against natural (eg fire and flood) or other (eg service outage, etc.) harmful effects. Anvert Ltd. provides data security with server and software-level security procedures and services.

Anvert Ltd. Protects your personal data in the course of data processing, so that you can access only those who have the right (confidentiality), the accuracy and completeness of your personal data and processing method (integrity), and ensure that when authorized users need it to access your personal data, you can actually access the data you want and have access to it (availability).

We inform stakeholders that personal data will be forwarded to Anvert Ltd. partly via the Internet. The security of data and electronic messages transmitted over the Internet, irrespective of the protocol used (e-mail, web, ftp, etc.), is vulnerable to network threats that are aimed at unfair practices, contract disputes, or disclosure or modification of information. In order to eliminate such threats, Anvert Ltd. Will take all the safety measures it expects.

Personal data breach and the management thereof

Under the European Data Protection Regulation (GDPR), a personal data breach is a security breach that results in accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal data transmitted, stored or otherwise handled. Therefore, any event or situation in which your personal data may become unauthorized may be considered a privacy breach.

In the event of a privacy breach, we will notify the incident to the competent supervisory authority immediately, but no later than 72 hours after the data protection breach has come to our attention. we will also inform you as a data subject if the privacy breach is likely to pose a risk to the rights and freedoms of natural persons.

5. Legal remedy, right to complaint, judicial redress

What can you do when you are of the opinion that your personal data are not processed lawfully?

Right to complaint

You, as the data subject, have the right to file a complaint with a supervisory authority, in particular your habitual residence, your workplace or the Member State where you are suspected of infringing, if the data subject considers that the personal data relating to him / her are in breach of law. In Hungary, the National Authority for Data Protection and Freedom of Information (NAIH) is the competent supervisory authority.

Exercising the right to complain does not preclude you, if you consider that your personal data is being processed in a way that is unlawful, to have recourse to other administrative or judicial remedies. Thus, even when exercising its right of complaint, it can also initiate administrative or judicial redress at the same time.

Complaints can be made to the National Authority for Data Protection and Freedom of Information, which contact details are as follows:

Name: National Authority for Data Protection and Freedom of Information

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

Mailing address: 1530 Budapest, Pf .: 5.

Phone: +36 70 277 2504 06 1 391 1400

Fax: 06 1 391 1410

Website: <http://www.naih.hu>

E-mail: ugyfelszolgalat@naih.hu

Right to judicial remedy against the decision of the NAIH or other supervisory authority

If you have contacted the supervisory authority (NAIH) regarding your data processing and the authority has made a decision on your case, then you, as the data subject, have the right to initiate legal remedy against this decision, ie to challenge the decision in court. You also have the right to a previous judicial remedy if the competent supervisory authority (NAIH) does not deal with the complaint or does not inform the person concerned of the procedural developments or the outcome of the complaint within three months.

The proceedings against the Supervisory Authority (NAIH) must be instituted before the court of the Member State where the supervisory authority is established.

Right to a judicial remedy against the controller or the processor

You, as the data subject, are entitled to a judicial remedy if you consider that your personal data has been violated by your personal data as a result of non-legal handling of your personal data. Exercising the right to judicial remedy does not exclude the possibility that you, if you consider that your personal data are being processed in an unlawful manner, should resort to other administrative or judicial remedies or exercise your right of complaint.

The proceedings against the controller or the processor must be brought before the courts of the Member State where the data controller or the processor is established. In the case of Anvert Ltd., the court of the place of business is the Hungarian courts. While the seat of Anvert Ltd. in the case of special powers, the Szeged Tribunal Court.

The judicial remedy procedure may also be initiated before the court of the Member State in which the data subject is habitually resident, except where the controller or the processor is a public authority of a Member State acting in the exercise of public authority.

Liability for damages and immaterial damages

How is data controller or data processor liable if they cause damages to the data subject?

If the inadequate data processing has caused damages to you as the data subject, the data controller is responsible for the compensation. Damage can also be substantiated, if the data processing was offensive or breached, and you as the data subject also had a financial disadvantage. In the case of unlawful data processing, you may also claim immaterial damages.

You can claim your claim for compensation or damages primarily from the data controller. The data processor is only liable for damages, if it has breached the rules applicable to it or has not followed the lawful instructions of the data controller. That is, the data processor is not responsible for the errors committed by the data controller.

6. List of laws applied in connection with the data processing activities

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 CXII os 2011 on Information Self-Determination and Freedom of Information (**Info**);

Act C of 2000 on Accounting;

Act CLV os 1997 Act on Consumer Protection;

Act V of 2013 on the Civil Code

7. Contacts

If you have any questions regarding the processing of your personal data or wish to exercise your rights in connection with our data processing, please contact Anvert Ltd. as a data controller.

The contact details of Anvert Ltd. are as follows:

Seat and mailing address: 6725 Szeged, Moszkvai boulevard 23. III. floor 15

E-mail :info@anvert.com

Phone: +36 20 392 7326

web: www.anvert.com

Representative of Anvert Ltd.: Fáth Ákoa managing director

E-mail: info@anvert.com