



## PROSPECTUS OF MULTI ALARM CO.'S DATA MANAGEMENT ORDER

BA 07-118 2.0. Valid from 25/5/18

### 1. Who manages your data?

**Data manager:** „Multi Alarm” Co.

**Seat:** 1106 Fátyolka u. 8, Budapest

**Trade registry number:** Cg. 01-10-044636

**Represented by:** László Miklós Zsolt executive director

**Tax number:** 11365073-2-42

**E-mail:** [adatkezeles@multialarm.hu](mailto:adatkezeles@multialarm.hu)

**Postla address:** 1399 Budapest, Post box: 694.

**Phone** +36 (20)/(30)/(70) 996 6013

**Data protection manager:** Bernadett Györfi

**Accessibility of the data protection manager:** [gyorfi.bernadett@multialarm.hu](mailto:gyorfi.bernadett@multialarm.hu)

(see furthermore as “Data manager”)

Data manager respects your personality rights, that is the reason, why the present data management order has been created, which can be accessed electronically on Data manager’s official home page.

### 2. Principles and legal prescriptions binding us during data management activity:

2.1. During data management activity, we are bound by the following legal acts and prescriptions:

- ✓ **GDPR (General data protection regulation)** – Regulation 2016/679 issued by the European Parliament and the about the protection of natural persons with regard to their personal data and the free flow of data, furthermore about the repeal of the regulation 95/46/EC;
- ✓ **Act of data protection**– Legal act CXII 2011 about the right of informational self-determination and information freedom, furthermore the legal prescriptions to its enforcement;
- ✓ Legal act CVIII 2001 about some questions of electronic trade services and the information society services;
- ✓ Legal Act V. 2013 about the Civil Code;
- ✓ Legal act CL 2017 about the taxation and the legal prescriptions to its enforcement;
- ✓ Legal act C 2000 about accounting and the legal prescriptions to its enforcement;
- ✓ Legal act XLVIII 2008 about the basic requirements and some restriction factors of economical advertising activity;
- ✓ Legal act CXXXIII 2005 about the regulation of personal and property protection and private detective activities.
- ✓ § 155 of legal act C 2005 about the electronic telecommunication
- ✓ Legal act CLV 1997 about the consumer protection;
- ✓ Regulation of the ministry of interior 54/2014. BM (XII.5.) about the national fire protection regulation;
- ✓ Legal act LXVII 2013 about the road toll for using highways, motorways and main roads, and the government regulation 209/2013. (VI.18.) to its enforcement;
- ✓ Legal act CXXXIII 2003 about the condominiums;

- ✓ Legal act CXV 2004 about the residence cooperatives;;
- ✓ Legal act XLVII 1997 about the management and protection of medical and connected personal data

2.2. During data management, we follow the principles defined below:

- a) Personal data will be managed by data manager for special purpose and for limited time. Data manager manages only data which are unavoidable necessary to fulfil the goals of the data management activity and which are appropriate to reach this goal.
- b) During data management, every personal data having been made familiar to data manager, will be handed out to persons authorized by data manager or employed by him, who have to fulfil special tasks with regard to the given data managing.

### 3. Explanation of terms used in the data management order:

- **personal data**: any kind of information regarding natural persons (affected persons), such like names, numbers, data of location definition, on-line identification codes, or data affecting physical, physiological, genetic, spiritual, economic, cultural or social identity of an affected natural person;
- **„special data“**: personal data affecting racial or ethnic origin, political position, confessional conviction or membership in trade union, furthermore genetic and biometric data for identification of natural person, furthermore personal data affecting medical status and sexual life or orientation of natural persons;
- **„medical data“**: personal data affecting physical or psychical status of a natural person, including every data with regard to medical services offered to a natural person, which has a data content about the medical status of the natural person;
- **“Affected person”**: is an identifiable natural person, who is affected by a given personal data, such like visitor of a home page, subscriber to a newsletter, natural persons attending job interviews).
- **„data management“**: is the sum of automatized or not automatized operations and actions on personal data or data bases, such like collecting, recording, organizing, splitting, storing, modifying or changing, querying, viewing, using, telling, forwarding, publishing or making anyway accessible, merging, restricting, deleting or erasing of data.;
- **„Data manager “**: is a natural or juridical person, public authority, agency or any kind of entity, which defines individually or together with others the goals and methods of personal data management;
- **„Data processing“**: completion of technical tasks connected with data management actions;
- **„Data processor“**: is a natural or juridical person, public authority, agency or any kind of another entities, which on behalf of the data manager (on behalf of mandate, order, decision) manages personal data;
- **„Third party“**: is a natural or juridical person, public authority, agency or and kind of other entities, which is not identical with affected person, data manager, data processor or persons, who directly led by data manager or data processor had been authorized to manage personal data;
- **„consent of affected person“**: clear statement of the will of affected person based upon proper information, through which affected person declares by statement or action expressing the consent undoubtedly, to have agreed to the management of his personal data,

#### **4. What kind of personal data will be managed by us (single data managements):**

##### **4.1. If you visit our home page [www.multialarm.hu](http://www.multialarm.hu) (data and cookies recorded and stored automatically):**

###### **4.1.1. Automatically recorded data**

If you visit our home page, the IP-address of your devices (notebook, PC, phone, tablet) will be automatically recorded and stored. During visiting our home page, data to be recorded will be tagged by the web server operating the home page automatically, even without of your special statement or action. From this data, the system creates statistical data automatically. Except cases defined by law, these data cannot be linked with other personal data. This data volume will be used exclusively in summarized and elaborated (aggregated) form, to improve and to correct our services, and for statistical purpose.

Purpose of the data management: Technical development of the informatics system, control of the service function, creation of statistics, and protection of visitor's right. In case of abuses these data can be used to detect abuse sources. The data have to be delivered compulsorily, the home page cannot be visited without delivering them.

Legal basis of the data management: (3) § 13/A of Legal act CVIII 2001 about some questions of electronic trade services and the information society services

Duration of data management: 30 days after visiting the home page.

###### **4.1.2. Cookies and similar technologies**

*What is a cookie??*

Cookies are small text files, which are stored on the hard disk of a computer or mobile devices until the expiration time defined in the cookie itself, and which will be activated in case of later visits, giving responds to the web server. Home pages use cookies, to record and to store information with regard to the visits (visited pages, spent time on the pages, surfing data, exists etc.), furthermore personal data. Cookies are dedicated to help to create user friendly home pages and to increase the visitor's online experiences.

On other platforms, where cookies are not accessible or they cannot be used, different technologies cannot be applied, whose dedication is very similar to the cookies'. these are e. g. text files on android mobile devices.

We differ between to kind of cookies: the session cookies and the persistent cookies. Both kind of them will be so long stored in the web browser until they will be deleted by the user.

- Session cookies will be stored on the computer, notebook or mobile devices only temporarily, until you exit the home page; these cookies help the system, to record information, so you have not to give them again by filling fields. Session cookies' validation time is restricted to single working processes initialized by user, they are dedicated to avoid data loss (for example during filling a longer form). After finishing the session, or by closing the web browser, this kind of cookies will be deleted from visitor's computer automatically.

- Persistent cookies remained on your computer, notebook, mobile device even after leaving the home page. These cookies help the system to recognize and to identify you as returning visitor of the home page. Persistent cookies are designed to identify you by linking the web server with the user, therefore they represent the requirements of proper function in every case, when a user has to be identified (web store, net banking, webmail). Persistent cookies contain by themselves no personal data, and they are able to identify users by linking with the data base of the provider. Cookies of this kind are risky for that reason, because not the user himself, but the web browser will be identified, so if someone enters a web store in public spaces such like a library or net café, and he does not log out when he leaves, everyone using the same computer later, will be granted unauthorized access to the web store on behalf of the proper user.

*What kind of cookies are used by us??*

#### **A. Cookies which are necessary to maintain our home page**

##### Purpose and duration of the data management:

Our home page uses one special session cookie, which is dedicated to record and store your steps made during your visit on our home page, e. g. to record contains written by you in the proposal request field for duration of your stay on the home page, or to record every web addresses to enable to return to them. Data of this kind will be erased by leaving the home page. Data have to be provided compulsory, the functions of the home page described above do not work without this.

##### Legal basis of the data management:

(3) § 13/A of Legal act CVIII 2001 about some questions of electronic trade services and the information society services

There will be no data forwarding processed.

#### **B. Cookies collecting statistical data**

We use three kind of statistical cookies. They watch how you use the home page, what kind of topics you view, what do you click on, how do you scroll the home page, which pages have been visited by you. But every information will be collected exclusively anonymously. So we can obtain information, how many visitors we had monthly. These statistical data help us to modify our home page according to customer demands. Cookie with extension “ga” send data for two years, meanwhile cookies with extension “gat” and “gid” are session cookies, and send out statistical data for duration of each single visit on the home page.

Collection of data of this kind is provided by Google Analytics too (by cookie with extension gat). Further information about the data protection of Google Analytics please find here: :

<https://support.google.com/analytics/answer/6004245?hl=hu>

*How can I enable or disable cookies?*

The most internet browsers accept cookies automatically, but visitors are entitled to erase or to refuse them. Since all web browsers are of different nature, you can set up your preferences regarding cookies individually by using the tools of the browser. But simultaneously you are also granted to erase cookies stored on your computer or mobile device every time. Further information regarding setups please find

in the help of our browser, our use the links above by clicking ctrl+ left mouse knob. Please consider that by disabling cookies on your device, you may miss some functions of the home page.

[Link to Microsoft's cookie installation guide](#)

[Link to Mozilla Firefox' cookie installation guide](#)

[Link to Google Chrome's cookie installation guide](#)

[Link to Opera' cookie installation guide](#)

[Link to Apple Safari's cookie installation guide](#)

#### **4.1.3. References and Links**

Our home page may contain also links which are operated not immediately by data manager, but which are dedicated to give information to the visitors. Data manager cannot influence contents and safety of home pages operated by partner companies, so he is not liable for them. Please read the data management orders of web sites visited by you carefully, before you would give your data in any form on them.

#### **4.1.4. Data processor**

The home page will be hosted by Multi Alarm Zrt., 1106 Fátyolka u. 8 Budapest.

#### **4.2. Facebook:**

We are available on Facebook registered as Multi Alarm Zrt.

For the news of Multi Alarm Co. users can subscribe by clicking on the like/follow link of the page, to unsubscribe please click on dislike/unfollow link, or you can erase unwished news by setting the news wall of Facebook.

If you follow us, your Facebook profile will be accessible to us, but we will manage or record/ store no data of this kind in our internal system. We never use your personal data for purpose beside this.

Legal basis of the data management: Your consent. You are entitled to withdraw your consent anytime, by unfollowing us. Withdrawal does not affect previous proper data management.

Purpose of the data management: to inform you about actual news, products, news affecting our company, and posting promotion articles and materials.

Duration of the data management: Our news appear on your page, as long you wish it,. If you unfollow us, no news will appear on your page. You can access your news by unfollowing us, but in this case you will get no special notification about them.

Facebook is data manager, which is independent from us. Please find information about its data management principle at

<https://www.facebook.com/policies/cookies/> ;<https://www.facebook.com/about/privacy/update>

No data processor or no data forwarding will be used.

### **4.3. If you intend to get a job in our company**

If you intend to apply for a job in our company by e-mail or postal mail (job advertisement or independently from it), we presume you have expressed your consent to manage your data.

Legal basis of the data management: your presumed consent. You are entitled to withdraw it anytime, but the withdrawal does not affect previous proper data management. Please consider that data management is unavoidable to reconsider your application and to select the proper employee.

Purpose of the data management: Contacting applicants and selecting proper applicants for the job.

Duration of the data management:

CV and further personal data sent to us with regard to the application will be managed after the proper employee has been selected:

- Refused applicants will be asked by e-mail or postal letter, whether he requires that we store his documents for one year and to write him in case of job offers. If in 30 days we receive a negative answer or our query remains unanswered, the job application and the personal data of the applicant will be erased from our system.
- Personal data of accepted applicants will be removed to the data of our employees.

General applications sent to us by postal or electronic mail, which are independent from concrete job advertisements, will be stored for 1 (one) year in our system. After expiration of one year, CV and other personal data will be erased.

Independently from this, you are entitled to require to erase your personal data. In this case we erase all defined personal data immediately.

Data forwarding will be not proceeded.

We may receive your application data from executive search companies or HR portals. Companies of this kind are independent data manager, so please gain information about their data management proceedings from their home pages.

No data processor or no data forwarding will be used.

### **4.4. If you contact us:**

You can contact us by every way we defined (through our home page, by e-mail, by phone, by postal letter). We give you special opportunity on our home page to give proposals or ask questions.

Legal basis of the data management.

Legal basis of the data management: your consent. You are entitled to withdraw it anytime, but the withdrawal does not affect previous proper data management. Please consider that data management is unavoidable to answer your questions or to fulfil your requests.

Purpose of the data management: Contacting, answering questions, fulfilling requests, solving problems.

Duration of data management: messages and received personal data through them we erase within 6 months after answering the questions or complaints. But if due to tax or accounting law it is necessary, they will be archived and stored for in each case individually considered necessary time.

#### **4.5. Direct contacting:**

We may contact you through personal contacting. In such a case, if you wish, we send you out our offer.  
Base of the data management:

Legal basis of the data management: your presumed consent. You are entitled to withdraw it anytime, but the withdrawal does not affect previous proper data management. Please consider that data management is unavoidable to answer your questions or to fulfil your requests.

Purpose of the data management: Contacting, sending of offers.

Duration of the data management: Messages and received personal data will be deleted within 15 (fifteen) days if the offer has been rejected. If the offer has been accepted, we will proceed according to the data management prescriptions of the given contract conditions.

No data processor or data forwarding will be proceeded.

#### **4.6. Recording of telephone calls**

We especially underline that both incoming and out-coming phone calls will be recorded. We hereby manage your personal data given to us during the phone calls. In case of your call you will be informed by one of our colleagues that the phone call will be recorded. You will be given furthermore the ID-code which you can refer later to. The recorded call will be handed to you in your demand free of charge.

Legal basis of the data management:

- ✓ In case of a contract entered with you as a private person, the legal basis is the fulfilment of the contract itself.
- ✓ In other cases, the legal basis of the data management is your consent. You are entitled to withdraw it anytime, but the withdrawal does not affect previous proper data management. Please consider that data management is unavoidable to answer your questions or to fulfil your requests properly.

Purpose of the data management: Recording and retrieving of instruction and customer complaint management.

Duration of the data management: Recorded calls will be stored for 6 (six) months. If you are our customer, the six months expiration time starts after the service contract has been expired.

No data processor or no data forwarding will be used.

#### **4.7. Report about customer complaint**

Customer complaint management will be proceeded in written or oral form at our availabilities defined above. if you enter a contract with us as private person and you do not agree with the complaint management, or the complaint cannot be investigated immediately, a report has to be made about it.

The report has to contain the following data:

:

- ✓ Name and residence of the customer,
- ✓ Place, time and mode of the complaint presenting,
- ✓ Detailed description of the customer complaint, list of documents and other proofs presented by the customer,
- ✓ our statement about the position of customer's complaint, if the complaint can be investigated immediately,
- ✓ Sign of the report maker and – except complaints made in written form using telephone or other electronic telecommunication device – the sign of the customer,
- ✓ Place and time of the report making
- ✓ In case of complaints made by telephone or other telecommunication device, the complaint ID code. There is a registry of complaint management at our company.

Legal basis of the data management: 17/A.§ of legal act CLV 1997 about the consumer protection Data providing is compulsory.

Purpose of the data management: Customer complaint management.

Duration of the data management: Report made about the customer complaint and the copy of the respond have to be preserved for 5 (five) years.

Data processing or data forwarding is not necessary.

#### **4.8. If you have a remote monitoring service for your alarm system:**

If you enter a service contract for remote monitoring service of your estate, we will manage your personal data which are necessary to fulfil the contract.

When the contract will be prepared, you need to give the following data:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and time;
- ✓ Mother's birth name;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;
- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing. Data providing is basic requirement for the signing of the contract.

Duration of the data management: After the contract has been expired, your data will be archived and stored for 5 (five) years. Documents defined by the actual accounting and tax law will be preserved and stored for 8 (eight) years. After this period, the data will be erased.

Data forwarding: Data may be forwarded to our subcontractors (see annex I). Our subcontractors acknowledged the content of this data management order for binding for themselves. On demand, we forward the managed data to the police.

No data processing will be necessary.

#### **4.9. If you have a service contract for fire alarm systems:**

If you enter a service contract for remote monitoring of fire alarm system, of your estate, we will manage your personal data which are necessary to fulfil the contract.

When the contract will be prepared, you need to give the following data:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and time;
- ✓ Mother's birth name;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;

- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing. Data providing is basic requirement for the signing of the contract.

Duration of the data management: After the contract has been expired, your data will be archived and stored for 5 (five) years. Documents defined by the actual accounting and tax law will be preserved and stored for 8 (eight) years. After this period, the data will be erased.

Data forwarding: Data may be forwarded to the National Catastrophe Prevention Service. No data processing will be necessary.

#### **4.10. If you have a remote monitoring service for elevators**

If you enter a service contract for remote monitoring of elevators, we will manage your personal data which are necessary to fulfil the contract.

When the contract will be prepared, you need to give the following data:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and time;
- ✓ Mother's birth name;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;
- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing. Data providing is basic requirement for the signing of the contract.

Duration of the data management: After the contract has been expired, your data will be archived and stored for 5 (five) years. Documents defined by the actual accounting and tax law will be preserved and stored for 8 (eight) years. After this period, the data will be erased.

Data forwarding: Data may be forwarded to the National Catastrophe Prevention Service. No data processing or data forwarding will be necessary.

#### **4.11. If you have a remote tracking service for vehicle:**

If you enter a service contract for remote vehicle tracking service, we will manage your personal data which are necessary to fulfil the contract.

When the contract will be prepared, you need to give the following data:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and time;
- ✓ Mother's birth name;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;
- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing. Data providing is basic requirement for the signing of the contract.

Duration of the data management: Vehicle tracks will be stored and preserved for 60 (sixty) days, but driver data will be erased earlier, after 5 (five) days.

No data processing or forwarding is necessary.

#### **4.12. If you have a road toll declaration service contract:**

If you enter a service contract for road toll declaration service, we will manage your personal data which are necessary to fulfil the contract.

When the contract will be prepared, you need to give the following data:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and time;
- ✓ Mother's birth name;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;
- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing. Data providing is basic requirement for the signing of the contract.

Duration of the data management: Vehicle tracks will be stored and preserved for 5 (five) years, but driver data will be erased earlier, after 5 (five) days.

Data forwarding: your data will be forwarded to the road toll collector.

No data processing will be necessary.

#### **4.13. If you have a service contract for operating of house video surveillance systems:**

If you enter a service contract for operating of house video surveillance systems, we will manage your personal data which are necessary to fulfil the contract.

When the contract will be prepared, you need to give the following data:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and time;
- ✓ Mother's birth name;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;
- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing. Data providing is basic requirement for the signing of the contract.

Duration of the data management: After the service contract has been expired, your personal data will be archived and stored for 5 (five) years, meanwhile documents and data prescribed by actual tax and accounting law will be stored for 8 (eight)years. Then your data will be erased. The video records will be erased after 15 (fifteen) days, except when they have to be forwarded to an authority.

Data forwarding: On demand, the managed data will be forwarded to the police.

No data processing will be necessary.

**Please note, that regarding the function of single video camera systems Customer has to inform all affected persons. We, of course, will provide all necessary information for this purpose.**

#### **4.14. If you have a medical emergency call service:**

If you enter a service contract for medical emergency call, to fulfil the contract, we will manage your personal data.

When the contract will be prepared for signing, you will have to give the following data of the person who uses the service:

- ✓ Name and surname;
- ✓ Birth name;
- ✓ Birth place and date;
- ✓ Mother's name;
- ✓ Social insurance number;
- ✓ Data regarding medical status;
- ✓ Residence;
- ✓ Phone number;
- ✓ E-mail address;
- ✓ Password.

For contract fulfilment purpose you have to give the data of that person, who can be contacted by us for cases defined in the service contract. You have to give the following data of the contact person.

- ✓ Name and surname of the contact person;
- ✓ phone number;
- ✓ password.

You are obliged to inform the contact person and, if necessary, you have to get his consent for the delivering of his data.

If you are the representative of a company, beside the company data we will need the following data of you:

- ✓ Name and surname;
- ✓ Phone number;
- ✓ E-mail address.

Legal basis of the data management: legal interests with regard to the contract fulfilment. With regard to your medical data, your data will be managed especially on basis of your consent, to have the opportunity to act in case of emergency as efficiently as possible. Data providing is a basic requirement of the contract entering.

Purpose of the data management: Preparing, creating, fulfilling of the contract, contacting and invoicing.

Duration of the data management: After the service contract has been expired, your personal data will be archived and stored for 5 (five) years, meanwhile documents and data prescribed by actual tax and accounting law will be stored for 8 (eight) years. Then your data will be erased. Except the registry, your medical data will be erased when the contract has ben expired.

Data forwarding:

- ✓ In case of emergency call your data will be forwarded to the areal competent patrol service, doctor, medic or ambulance man.
- ✓ The forwarding of the medical data will be registered separately. The registration is prescribed by (1) § 28 of the legal act XLVII 1997 about the management and protection of medical and connected personal data, and according to (1) §30 of the same act we are obliged to preserve and to store them for 30 (thirty) years. Medical data will be treated as medical secrecy, therefore they will be handed

out or forwarded only on request of you, your legal or mandatory representative or only in cases defined by law. On request, we give written information about information rights of spouses, descendants, partners, close relatives, heirs, further the legal defined way of data forwarding. Management of medical data will be defined and regulated by the legal act XLVII 1997 about the management and protection of medical and connected personal data.

No data processing will be necessary.

#### **4.15. Registry**

According to legal prescriptions, we registry all contracts we entered in our system. The registry contains the name, residence/seat of Customer. Any changes, extensions, emendations of the registry must be executed that way that the originally registered text remains accessible.

Legal basis of the data management: § 15 of legal act CXXXXIII 2005 about the regulation of personal and property protection and private detective activities.

Purpose of the data management: Compliance with legal prescriptions through registering. Data registry, therefore data giving is a legal requirement.

Duration of data management: Registry has to be preserved and stored for 5 (five) years after the last remark made in it.

Data forwarding: We are obliged to provide that police and other authorities and, with regard to the own data, affected persons have access to the registry and their supplements.

No data processing is necessary.

#### **4.16. Entry into the area of the remote monitoring centre**

Data of visitors of our facilities will be not managed, except guests, who enter the area of the remote monitoring centre. They have to fill a secrecy statement, which they have to give the following data on:

- ✓ Name and surname;
- ✓ Birth date;
- ✓ Time of entry and exit

The data management is only necessary for safety of the building, the valuables of it and the people being there.

Legal basis of the data management

Az adatkezelés jogalapja: Your consent. You are entitled to withdraw your consent anytime, by unfollowing us. Withdrawal does not affect previous proper data management. Please consider that in case of withdrawn or refused consent you cannot enter the remote monitoring operation room.

Purpose of the data management: to provide safety of the visitors and the property values of the remote monitoring operation room.

Duration of the data management: The ID data (name, birth date) of the visitors will be erased after 3 (three) days after they have left the facility. An expect makes if the data needed to be forwarded to an authority.

Data forwarding: on request, the managed data will be forwarded to the police.

No data processing is necessary.

#### 4.17. Video surveillance system of our company

To provide personal and property safety, our company operates video surveillance system on its area. The cameras and the video surveillance is marked by the proper pictogram and warning text.

Data management regarding the video surveillance system will be given on the spot, in the given house. On request, the information sheet about the data management order of the video system will be forwarded to you by e-mail.

#### 4.18. Business relationships

During contractual and other relationship with our business partners we share the availability of our contact persons and manage the availability of the contact persons of our partners.

Legal basis of the data management: our interest with regard to the contract fulfilment or to maintaining contacts between companies. Data are necessary to provide maintaining of the business relationships.

Purpose of the data management: Contacting for contractual purpose or for preparing of contract, or for other business reasons.

Duration of data management: data of contact persons will be managed during our business relationship until we have been informed by our partner about change of the contact person. No data forwarding or processing is necessary.

#### 5. Other data forwards or data processing actions:

- ✓ To provide proper invoicing, we use the services of an external company **Wasco Trade Ltd.**, 9090 Pannonhalma, Ady st.. 10.) which sends out our invoices. We send to this company the data, which are necessary to issue an invoice, electronically. We also send out your name and address to them. On basis of the sent data, the commissioned company prints, envelopes and posts the invoices. The commissioned company acts as data processor.
- ✓ If you even on call do not pay your debts on due, your data will be forwarded to a debt collector company (**INTRUM JUSTITIA Co.**, 1138 Budapest, Váci út 144-150.). During debt managing this company acts as data manager. Its data management order is available at:<https://www.intrum.hu/ados-ugyfeleknek/mivel-foglalkozik-az-intrum/adatvedelem/altalanos-adatkezelesi-tajekoztato/>

Your data will be forwarded only to data processors and data managers defined in this data management order, the forwarding will be proceeded only in way described there. Data cannot be forwarded to other data manager unless you have given your consent previously.

We reserve the right to deliver managed personal data in cases defined by law to authorities, courts even without the consent of the affected person.

#### 6. Your rights

With regard to the data management, you are affected by rights defined in chapters 6.1-6.7 of the present data management order. If you intend to use one of them, please write us to one of our availabilities listed below:

**Postal address:** 7601 Pécs, PB.: 331.

**E-mail address:** adatkezeles@multialarm.hu

### *Identification*

To fulfil your request, you have to be identified by us in every single case. Without identification, unfortunately, your request cannot be fulfilled.

### *Answering a question*

After your identification has been completed, your request will be answered by mail, electronically – or on your request – in oral form. Please note, if you applied your request electronically, it will be answered electronically, too. In this case, of course, you are entitled to request other answering methods. ó

### *Administration deadlines*

You will be informed latest within 1 (one) month after request receive about measurements we have taken. If necessary, due to the complexity of the request and the amount of received queries, this deadline can be extended to other 2 (two) month. About prolongation you will be informed within the one month administration period.

We are furthermore obliged to inform you within one month about not taking measurements. You are entitled to claim it at NAIH (see chapter 7. 1.) and you can turn to a court to enforce your rights (chapter 6.2).

### *Administration fee*

Requested information and taking of measurements are free of charge, expecting that case if the request was undoubtedly groundless or – especially due to its repeating – extreme. In this case we are entitle to charge you a administration fee or to deny the fulfilment of your request.

## **6.1. You can withdraw your consent**

In case of data management based upon your consent, you are anytime entitled to withdraw your consent. In such of a case within 5 (five) working days after receive of your notification your personal data regarding the given data managing action will be erased from the system. We hereby inform you that your withdrawal does not affect properness of data managements based upon your previously given consent.

## **6.2. You can request information (access)**

You can request information, whether your data are being managed, and if yes:

- ✓ What is its purpose?
- ✓ What kind of data are being managed?
- ✓ Who will be the data forwarded to?
- ✓ How long will be stored the data?
- ✓ What kind of rights and remedies do you have regarding the data management?
- ✓ Who did we get your data from?

- ✓ Did we make automatized decision with regard to you by using your personal data? In such of a case you are entitled to be informed, what kind of logics (method) has been applied, and what kind of importance data managements like this are, and what kind of consequences does it have.
- ✓ If you made the perception that your data have been forwarded to international organization, third country (outside of the EU), you can request us to proof, what guarantees the proper management of your data.
- ✓ You can request a copy of your managed personal data (for further copies you may be charged a fee based upon administrative costs).

### **6.3. You can request corrections**

You are entitled to request us to correct or to supplement your improperly or incompletely recorded personal data.

### **6.4. You can request to erase your personal data (“oblivion”)**

You can request to erase your personal data,

- a) if the personal data are not more needed for the reason they were managed before;
- b) in case of data managements exclusively on basis of your consent;
- c) If’s manifested that your personal data have been managed unlawfully.
- d) if it is prescribed by domestic or European law;
- e) if personal data have to be erased to fulfil a legal obligation regarding data manager defined by domestic or European law;

If data manager has published personal data, and he is obliged to erase them according the prescriptions described above, he has to take expectable measurements with regard to the accessible technology and realization costs, to inform data processors that affected person requested to erase the links leading to the affected personal data, or the copy of the data.

Personal data **cannot be erased**, if they are necessary:

- a) to guarantee practice of freedom of expression and information;
- b) due to public interest or fulfilment of obligations regarding data managers, prescribed by domestic or European law;
- c) for public interest regarding public health;
- d) for purpose of archiving of public interest, of scientific, historical research or making statistics, if the erasing made data management presumably impossible; or
- e) for enforcement and protection of legal claims.

### **6.5. You can request to restrict data management**

If one of the conditions listed below has been fulfilled, you can request to restrict data management:

- ✓ if you debate the accuracy of your personal data, the restriction will affect that time interval, which makes possible to check the accuracy of the personal data;
- ✓ If the data management is unlawful, but you oppose data erasing, and instead of that you request to restrict theirs use.
- ✓ If we do not need your personal data for data management purpose, but you need them for enforcement, protection of legal claims;

- ✓ If you protested against data management; in this case the restriction affects that time interval, until it will be stated, whether your, or the data manager's lawful reasons have to be favored.
- ✓ In case of restriction, personal data can be managed only with your consent, or to enforce, protect of legal claims, or to protect the rights of other natural or juridical person, or for public interest of the EU or one of the member states. Exception is the storage of data.  
About the possible lifting of the restriction you will be informed in advance.

## **6.6. You can request to give over your personal data (right of data portability)**

You are entitled to get your personal data managed by us in readable electronic format, furthermore you are entitled, to forward these data to another data manager, or to request us to forward them to him, if the data management is exclusively on basis of your consent, or of a contract entered with you or in your interest, and it happens on automatized way.

This right mentioned above cannot be applied in that case, if the data management was necessary for execution of a task of public interest. It cannot violate right of erasing and cannot affect rights and freedoms of others disadvantageously.

## **6.7. You can protest against the management of your personal data**

You can protest against the management of your personal data, if:

- ✓ the data management is necessary to proceed a task of public interest;
- ✓ the data management is necessary to enforce the lawful interests of a third party;

In the cases described below, we erase the personal data, except, when their management has lawful reasons which have precedence over your interests, rights and freedoms, or which are part of enforcement or protection of legal claims.

You can furthermore protest against the management of your personal data, if:

- ✓ the data management will be proceeded for the purpose of direct marketing. In this case the personal data will be erased.
- ✓ the data management will be done for purpose of scientific and historical research or statistics analysis. In this case the personal data will be erased, except if the data management is necessary for execution of a task of public interest.

## **7. You can get aid for legal problems**

### **7.1. You can apply a claim at NAIH (National Office for Data and Information Safety)**

If your personal data will be managed violating prescription of the data protection order, so you are entitled to apply a claim at the supervising authority in your residence, at the location of your employment, or in the member country, where the violation has been committed. In Hungary you can turn to the National Office for Data and Information Safety (see furthermore: NAIH).

Chief of NAIH is: dr. Attila Péterfalvi

Postal address: 1530 Budapest, PB.: 5  
Residence: 1125 Budapest, Szilágyi Erzsébet fasor 22/c  
Phone: +36 (1) 391-1400  
Telefax: +36 (1) 391-1410  
web: <http://naih.hu>  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) vagy [privacy@naih.hu](mailto:privacy@naih.hu)

## **7.2. You can turn to court**

If you are convinced, the management of your personal data does not meet the prescriptions of the Data Protection Order, and your rights have been therefore violated, you are entitled to turn to court.

Proceedings against the data manager or data processor have to begin at courts located in the member country where the data processor is employed. Proceedings of this kind can begin also at courts of your state of usual residence.

In Hungary, proceedings will be judged by the tribunals. The proceedings can begin also at courts of the permanent or actual residence of the affected person. Process party can be also subjects who do not have capacity to bring legal proceedings.

The authority is entitled to enter the proceeding if it is necessary for the favor of the affected person. The legal proceeding is regulated by the Data protection order, by 2:51 – 2:54 of the legal act V. 2013e about the Civil Code and by other legal prescriptions regarding court proceedings.

## **7.3. Action for damages and penalty**

If data manager causes damages by unlawful management of the data of affected person, or he violates the personality rights of data manager, affected person is entitled to enforce a penalty. Data manager will be free of the liability of damage action or penalty payment, if he can proof that the damages or the violation of the personality rights of affected person have been caused by unavoidable reasons beside of the data managing.

## **8. Data safety**

We will do everything, with regard to actual technical and technological development status, realization costs, kind of the data management, furthermore risks of rights and freedoms of natural persons, to take the proper technical and organizational measurements to provide data safety meeting the risk level.

Personal data will be managed always confidentially, with restricted accessibility, with encoding and minimalizing of ability of resistance, ensuring the option of data re-gaining. Our system will be tested regularly to provide safety. By setting proper safety levels, we consider all risks caused by data management, which occur from accidental or unlawful destroying, loss, modification, unlawful publishing of stored, forwarded or differently managed data.

We do everything to provide that our employees having access to the personal data can manage them only according to our instructions, except, when they are obliged by national or European law to deviate from this,

## **9. Obligation of confidentiality**

During our activities, we have obligation of confidentiality. This obligation is valid both for the interval of our activity and the time after that, and affects all data, facts we have been familiar during the contract period with. The obligation of confidentiality can be derogated only by law or – with regard to his own data – by the Customer himself.

#### **10. Other prescriptions**

Data manager is anytime entitled to modify this Data management order. Any modifications will be enforced simultaneously with publishing it on our home page. About the modifications you will find information on the home page.

*Last update on: 25. 05. 2018.*