

PROFIGRAM TRANSILVANIA S.R.L

EXTERNAL

DATA PROCESSING NOTICE

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Varga Árpád
CEO
PROFIGRAM TRANSILVANIA S.R.L

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1 INTRODUCTION

Profigram Transilvania S.R.L. (Romania, Libertății street, 157/3, Apahida, Cluj), as **data controller**, acknowledges the content of this legal notice as binding. It undertakes to ensure that all data processing related to its activities complies with the requirements set out in this policy and the legislation in force.

Profigram Transilvania S.R.L. data protection policies arising in connection with the processing of your data are continuously available on the www.profigram.ro

under the "Privacy Policy" menu item in the footer.

Profigram Transilvania S.R.L reserves the right to change this notice at any time, while ensuring traceability and traceability of changes.

Profigram Transilvania S.R.L. It is committed to the protection of the personal data of its clients and partners, and considers it of utmost importance to respect the right of its clients to informational self-determination. Profigram **Transilvania S.R.L** The company handles personal data confidentially and takes all security, technical and organizational measures that guarantee the security of the data.

Profigram Transilvania S.R.L describes its THIRD-Party Data Practices below:

1.1 LEGAL REGULATORY ENVIRONMENT FOR THE PROCESSING OF PERSONAL DATA

The data processing activities of Profigram Transilvania S.R.L are based on the GDPR principles corresponding to the given data processing. In certain cases, however, the management, storage and transmission of a set of data provided is made mandatory by law, about which there is a separate information in this document in accordance with the regulations.

We would like to draw the attention of those who provide data to Profigram Transilvania S.R.L that if they do not provide their own personal data, it is the duty of the informant to obtain the consent of the data subject.

The principles of data processing of Profigram Transilvania S.R.L are in accordance with the legislation in force in relation to data protection, in particular:

1. 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);
2. Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, as amended on the basis of Act XXXVIII of 2018 and effective from 25.08.2018;
3. Act V of 2013 – on the Civil Code (Civil Code);
4. Act CLV of 1997 – on Consumer Protection (Consumer Protection Act);
5. Act XIX of 1998 – on Criminal Procedure (Be.);
6. Act C of 2000 – on Accounting (Accounting Act);
7. Act CVIII of 2001 – on certain issues of electronic commerce services and information society services (Eker. tv.);
8. Act C of 2003 – on Electronic Communications (Eht.);
9. Act CXXXIII of 2005 – on the Rules of Personal and Property Protection and Private Detective Activities (SzVMt.);
10. Act XLVIII of 2008 – on certain restrictions on commercial advertising activities (Grt.).

1.2 Basic concepts

The basic concepts are indicated on the basis of the effective Information Act and the <https://www.naih.hu/adatvedelmi-szotar.html>.

Data controller: a natural or legal person, or an organisation without legal personality, who or which, independently or jointly with others, determines the purpose of data processing, makes and implements decisions concerning data processing (including the means used), or has the data processor carry them out;

Data processor: a natural or legal person or an organisation without legal personality, who or which performs data processing on the basis of a contract, including a contract concluded on the basis of a provision of law;

Data breach: (GDPR 4. Article. (12)) and the Infotv. Pursuant to Section 3 of the Criminal Code, a violation of data security that results in the accidental or unlawful destruction, loss, alteration, unauthorized transmission or disclosure of, or unauthorised access to, the transferred, stored or otherwise processed personal data;

Data Subject: any natural person identified or identifiable – directly or indirectly – on the basis of personal data;

User: Any Data Subject who is a member of Profigram Transilvania S.R.L the services of the IT system provided by the company;

Profiling: any form of automated processing of personal data in which personal data is used to evaluate certain personal characteristics relating to a natural person, in particular to analyse or predict characteristics relating to performance at work, economic situation, state of health, personal preferences, interests, reliability, behaviour, location or movement;

Personal data: data that can be linked to the data subject, in particular the data subject's name, identification number, and one or more knowledge specific to his or her physical, physiological, mental, economic, cultural or social identity, as well as the conclusions that can be drawn from the data concerning the data subject.

2 THE METHOD OF STORING PERSONAL DATA AND DATA PROCESSING

- Profigram Transilvania S.R.L and its processors shall implement appropriate technical and organisational measures, taking into account the state of the technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons, in order to guarantee a level of data security appropriate to the extent of the risk.
- Profigram **Transilvania S.R.L** The IT tools used for the processing of personal data are selected and operated in such a way that the processed data:
 - accessible to authorised persons (availability);
 - its authenticity and authentication are ensured (credibility of data processing);
 - its immutability can be verified (data integrity);
 - be protected against unauthorized access (data confidentiality).
- Profigram Transilvania S.R.L protects the data by appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction, damage and inaccessibility due to changes in the technology used.

- In order to protect the data files managed electronically in its various registers Profigram Transilvania S.R.L, ensures with an appropriate technical solution that the stored data – unless permitted by law – cannot be directly linked and assigned to the data subject.
- With regard to the current state of technology, Profigram Transilvania S.R.L ensures the protection of the security of data processing with technical, organisational and organisational measures that provide a level of protection appropriate to the risks arising in connection with data processing.
- During data processing, Profigram Transilvania S.R.L retains
 - **confidentiality:** it protects information so that only those who are entitled to it can access it;
 - **integrity:** protects the accuracy and completeness of the information and the method of processing;
 - **availability:** ensures that the authorised user has access to the information they want when they need it, and that the tools are available
- Profigram **Transilvania S.R.L** and the IT systems and networks of the partners involved in data processing are protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, computer break-ins and attacks leading to denial of service. The operator ensures security with server-level and application-level protection procedures. We inform users that electronic messages transmitted over the Internet, regardless of the protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that lead to dishonest activity, disputes contracts, or disclosure or modification of information. In order to protect against such threats, the Data Controller takes all precautions that can be expected of it. It monitors systems to record all safety incidents and provide evidence for every security incident. System monitoring also makes it possible to check the effectiveness of the precautions taken.
- Profigram **Transilvania S.R.L** as a data controller, it keeps a record of any personal data breaches, indicating the facts related to the personal data breach, its effects and the measures taken to remedy it.
- The possible data breach was investigated by **Profigram Transilvania S.R.L.** without delay and, if possible, no later than 72 hours after becoming aware of the personal data breach, it shall report it to the National Authority for Data Protection and Freedom of Information, unless the personal data breach is not likely to entail a risk to the rights and freedoms of natural persons.
- Profigram **Transilvania S.R.L** informs the data subject without undue delay pursuant to Article 34 (1) and (2) of the GDPR, the data controller informs the data subject of the personal data breach if the personal data breach is likely to entail a high risk to the rights and freedoms of natural persons, and describes it clearly and comprehensibly in the information provided to the data subject:
 - the nature of the personal data breach;
 - the name and contact details of the Data Protection Officer or other contact person who provides further information;
 - the likely consequences of the personal data breach;
 - the measures taken or planned by the controller to remedy the personal data breach, including, where applicable, measures aimed at mitigating any adverse consequences arising from the personal data breach.
- The User is solely responsible for the veracity and accuracy of the data provided by the User. Profigram **Transilvania S.R.L does** not take responsibility, expressly excludes its liability in this regard, but provides the Data Subject with the possibility of modification with regard to the data managed by the data controller and provided by the Data Subject
- It is applicable to all data processing that **Profigram Transilvania S.R.L** it does not process the data deleted by itself or by the User after deletion, it removes them from its database.

3 DATA AND CONTACT DETAILS OF THE DATA CONTROLLER

Name: **PROFIGRAM TRANSILVANIA S.R.L.;**
Headquarters: **Romania , Libertății street, 157/3 Apahida, Cluj.**
Company registration number: **01-10-140451;**
Name of the court of registration: **Court of Registration of the Metropolitan Court;**
Tax number: **27043435-2-43;**
Phone: **+36 (1) 488 7744;**
E-mail: [info@profigram.ro.](mailto:info@profigram.ro)

4 LEGAL REMEDIES

The data subject may request information about the processing of his or her personal data, and may request the rectification of his or her personal data, or - with the exception of mandatory data processing - the deletion or revocation of data processing, and may exercise his or her right to data portability and objection in the manner indicated at the time of data recording, or through the data controller's customer service.

4.1 Right to information:

Pursuant to **Articles 13 and 14**, at the request of the data subject, **ProfigramTransilvania S.R.L.** take appropriate measures to provide data subjects with all information on the processing of personal data **referred to** in Articles 13 and 14 of the GDPR and all information **pursuant to Articles 15 to 22 and 34** in a concise, transparent, intelligible and easily accessible form, drafted in plain and intelligible language. Therefore, the data controller is **Profigram Transilvania S.R.L.** By preparing this notice, developing, regulating and maintaining data processing processes, it ensures that the data subjects are informed at the right time, in the right way, in accordance with the regulations.

4.2 Right of access to the data subject:

According to **Article 15**, the data subject has the right to receive feedback from the controller as to whether his or her personal data is being processed and, if such processing is in progress, he or she has the right to have access to the personal data and to the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed addressees, in particular third country addressees and international organisations; the planned duration of storage of personal data; the right to rectification, erasure or restriction of processing and the right to object; the right to lodge a complaint with a supervisory authority; information about data sources; the fact of automated decision-making, including profiling, as well as comprehensible information about the logic used and the significance of such processing and the expected consequences for the data subject. In the case of a transfer of personal data to a third country or an international organisation, the data subject has the right to be informed of the appropriate safeguards for the transfer.

- Profigram **Transilvania S.R.L.** provides the data subject with a copy of the personal data subject to data processing.
- For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.
- At the request of the data subject, the information will be provided by **Profigram Transilvania S.R.L** in electronic form.
- The right to information **may be exercised in writing through the contact details specified** in the Introduction and Section 3.
- Upon request, the data subject may also be informed orally after credible verification and identification of his or her identity.

4.3 Right to rectification:

Pursuant to Article 16, at the request of the data subject, taking into account the purpose of data processing, **Profigram Transilvania S.R.** the personal data is rectified if it is not true and the correct personal data is available to the user.

4.4 Right to erasure:

According to **Article 17**, the data subject has the right to request that Profigram Transilvania S.R.L erase personal data concerning him or her without undue delay where one of the following ground applies: personal data is no longer necessary for the purposes for which it was collected or otherwise processed;

- the data subject withdraws his/her consent on which the data processing is based and there is no other legal basis for the data processing;
- the data subject objects to the processing and there is no overriding legitimate reason for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation imposed on the controller by Union or Member State law;
- Personal data was collected in connection with the provision of information society services.

4.4.1 The deletion of data cannot be initiated if data processing is necessary:

- for the purpose of exercising the right to freedom of expression and information;
- for compliance with an obligation under Union or Member State law to which the controller is subject to the processing of personal data;
- for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- in the field of public health, archiving, scientific and historical research or statistical purposes, on grounds of public interest;
- in the case of data processing necessary for the establishment, exercise or defence of legal claims.

4.5 Right to restriction of processing:

Pursuant to **Article 18**, at the request of the data subject, **Profigram Transilvania S.R.L.** restrict processing if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies to the period that allows the accuracy of the personal data to be verified;
- the processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of its use;
- the controller no longer needs the personal data for the purpose of data processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
- the data subject objected to the processing; In this case, the restriction applies to the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

Where processing is subject to restriction, personal data may only be processed, with the exception of storage, with the consent of the data subject 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.

Profigram **Transilvania S.R.L.** informs the data subject in advance of the lifting of the restriction of data processing.

4.6 Right to data portability:

According to **Article 20**, the data subject has the right to receive the personal data concerning him or her, which he or she has made available to the controller, in a structured, commonly used and machine-readable format and to transmit those data to another controller.

4.7 Right to object:

According to **Article 21**, the data subject has the right to object, on grounds relating to his particular situation, at any time to the processing of his personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or to the processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions.

In the event of an objection, the controller may no longer process the personal data, unless it is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or which are related to the establishment, exercise or defence of legal claims.

If the processing of personal data is carried out for the purpose of direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him or her for this purpose, including profiling, insofar as it is related to direct marketing.

In the case of an objection to the processing of personal data for direct marketing purposes, Profigram Transilvania S.R.L. will no longer process the data for such purposes.

4.8 Automated decision-making in individual cases, including profiling:

According to Article 22, the data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him/her.

The above right shall not be applied if the data processing is necessary for the conclusion or performance of a contract between the data subject and the data controller; it is made possible by Union or Member State law applicable to the controller, which also lays down appropriate measures for the protection of the rights and freedoms and legitimate interests of the data subject; or on the explicit consent of the data subject.

4.9 Right of withdrawal:

The data subject has the right to withdraw his consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

4.10 Rules of procedure:

According to Article 12(3), the controller shall inform the data subject of the measures taken in response to the request pursuant to Articles 15 to 22 of the GDPR without undue delay, but in any event within one month of receipt of the request. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by a further two months. The data controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. If the data subject has submitted the application electronically, the information will be provided electronically, unless the data subject requests otherwise. If the controller does not take action on the data subject's request, it shall inform the data subject without delay, but no later than one month from the receipt of the request, of the reasons for the failure to take action, and of the fact that the data subject may lodge a complaint with a supervisory authority and exercise his or her right to judicial remedy.

Profigram **Transilvania S.R.L** provides the requested information and notification free of charge. If the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may charge a reasonable fee or refuse to act on the request, taking into account the administrative costs involved in providing the requested information or information or taking the requested action.

The controller shall inform all recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out by the controller, unless this proves impossible or requires a disproportionate effort. At the request of the data subject, the data controller shall inform the data subject about these recipients.

The data controller shall provide the data subject with a copy of the personal data subject to data processing. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. If the data subject has submitted the request electronically, the information will be provided in electronic format, unless the data subject requests otherwise.

4.11 Compensation and grievances:

Any person who has suffered material or non-material damage as a result of a violation of the GDPR is entitled to compensation for the damage suffered from the data controller or data processor. The data processor shall only be liable for the damages caused by the data processing if it has not complied with the obligations set out in the law and specifically incumbent on the data processors, or if it has ignored or acted contrary to the lawful instructions of the data controller. If several controllers or multiple processors, or both the controller and the processor, are involved in the same processing and are liable for any damage caused by the processing, each controller or processor shall be jointly and severally liable for the entire damage. The data controller or the data processor shall be exempt from liability if it proves that it is not liable in any way for the event causing the damage.

4.12 Complaint to the Data Protection Officer (DPO)

Profigram **Transilvania S.R.L** 679/2016 EU GDPR 37. and based on the completion of an impact assessment, it is not obligated to appoint a Data Protection Officer. Since **Profigram Transilvania S.R.L** is committed to the protection of the personal data of the data subjects, therefore our appointed colleague will deal with your questions and problems related to data processing, and in such cases, please feel free to contact **our data protection officer**:

Company name: **PROFIGRAM Transilvania S.R.L.;**
Phone: **+36 (1) 488 7744;**
e-mail cím: **adatvedelem@profigram.hu.**

4.13 Right of recourse to the court:

In the event of a violation of his or her rights, the data subject may turn to the court against the data controller (competent according to the defendant's registered office or the data subject's place of residence, depending on the data subject's choice). The court proceeds in the case out of turn. Lawsuits filed in connection with the protection and connection of personal data are free of charge.

4.14 Data protection authority procedure:

Complaints can be lodged with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

5 ITEMIZED LIST OF PROCESSING OF PERSONAL DATA

5.1 Data Processing of www.profigram.ro

5.1.1 Data Processing of www.profigram.ro

Profigram **Transilvania S.R.L** (Romania,,Libertății street,157/3, Apahida, Cluj) is the data controller. When you visit www.profigram.ro web pages, the web server does not record user data.

Data processing related to logging by external data controllers:

The HTML code of the portal is provided by **Profigram Transilvania S.R.L** contains links to external servers that are independent of the company. The server of the external data controller is directly connected to the user's computer. We would like to draw the attention of our visitors to the fact that the data controllers of these links collect user data (e.g. IP address, browser, operating system data, mouse cursor movement, address of the visited page and time of visit) according to the parameters specified in the "cookies" section.

Purpose of data processing:ensuring the proper operation of the server server, justification of system activities

Legal basis of data processing: the data controller has a legitimate interest in providing users with tailored services [Article 6(1)(f) of the GDPR].

Type of personal data processed: identification number (which is stored on the user's computer with the help of a cookie), address of the page visited, date and time of visit, data of the user's computer and browser, screen resolution, language settings, identification number generated from the IP address of the user's computer.

Duration of data processing: 30 days.

Joint controller(s): None.

Data processor(s):

| Name | Seat | Data processing task |
|------------------------------|---|---|
| PROFIGRAM Transilvania S.R.L | 407035 Apahida, Libertății street,156/3, Cluj | Technical implementation of log analytics |
| Magyar Hosting Zrt. | 1132 Budapest, Victor Hugo utca 18-22. | Provide online storage |

5.1.2 The www.profigram.ro website manages its own "Cookie"

Profigram **Transilvania S.R.L** (407035 Apahida, Libertății street,156/3, Cluj)is the data controller.

In order to provide a customized service, the data controller places a small data package, a so-called cookie, on the user's computer and reads it back during a subsequent visit. If the browser returns a previously saved cookie, the data controller managing the cookie has the option of linking the user's current visit to the previous one, but only with regard to its own content.

Purpose of data processing: identification and distinguishing of users, identification of the users' current session, storage of the data provided during the session, prevention of data loss, web analytics.

Legal basis of data processing: the data controller has a legitimate interest in providing users with tailored services [Article 6(1)(f) of the GDPR].

The scope of the data processed: identification number, date, time, and the activities performed on the www.profigram.ro site.

Duration of data processing: 16 months.

Data processors:

| Name | Seat | Data processing task |
|----------------------------|---|--|
| PROFIGRAM TRANSILVANIA SRL | 407035 Apahida, Libertății street,156/3, Cluj | Website Developer |
| Magyar Hosting Zrt. | 1132 Budapest, Victor Hugo utca 18-22. | Provide online storage |
| Magyar Hosting Zrt. | 1132 Budapest, Victor Hugo utca 18-22. | Performing backups on the website, performing development and database related tasks |

Cookies with a precise expiry date (permanent) are stored on your computer until they are deleted, but no later than until their expiry date.

The user can delete the cookie from his own computer or disable the use of cookies in his browser.

A cookie is an alphanumeric information package sent by a web server with variable content, which is recorded on the user's computer and stored for a predetermined period of validity. The use of cookies provides an opportunity to query certain data of the visitor and to monitor the use of the Internet. With the help of cookies, the interests of the user concerned, his or her internet usage habits, and website visit history can be precisely determined. Since cookies act as a kind of tag, with which the website can recognize the visitor returning to the site, their application can also be used to store a valid username and password on the given page. If the user's browser sends back the cookie previously saved on the hard drive during the visit to the website, the data controller sending it may link the current visit with the previous one, but since the cookies are tied to the domain, it can only do so with regard to its own content. Cookies alone are not capable of identifying the user, they are only suitable for recognizing the visitor's computer.

5.1.3 Data processing of the www.profigram.ro website on the "Request an offer" and contact subpage

Profigram Transilvania SRL (407035 Apahida, Libertății street,156/3, Cluj407035 Apahida, Libertății street,156/3, Cluj) is the data controller.

In order to provide customized service from the user to facilitate contact, the data controller provides our customers (data subject) with an easy-to-use and secure interface for contacting and providing further information and answering any questions.

The data controller requests the data exclusively for the purpose of contacting us, does not pass them on to third parties, and does not use them for further marketing purposes.

Purpose of data processing: to contact the data subject by telephone and e-mail. **Legal basis for processing:** Processing based on consent pursuant to [Article 6(1)(a) of the GDPR]. **Scope of processed data:** name, e-mail address, subject, message

Duration of data processing: the data provided by the data subject will be stored until revocation, but no later than one year.

Duration of data processing: the data provided by the data subject will be stored until revocation, but no later than one year.

Data processors:

| Name | Seat | Data processing task |
|----------------------------|---|--|
| PROFIGRAM TRANSILVANIA SRL | 407035 Apahida, Libertății street,156/3, Cluj | Website Developer |
| Magyar Hosting Zrt. | 1132 Budapest, Victor Hugo utca 18-22. | Provide online storage |
| Microsoft Office 365 | Microsoft Hungary Ltd., 1031 Budapest, Graphisoft Park 3. (Záhony u.) | providing correspondence services, and storage-mails and documents |

The length of the retention period was determined by the legitimate interest of the data controller to be able to justify the recalls and the related costs in the event of an official investigation.

The length of the retention period was determined by the legitimate interest of the data controller and the data processor to be able to justify the conversations and the related costs in the event of an official investigation.

If the user (visitor, data subject) enters into a contract with the data processor, the data processing will be modified as follows:

New data controller: Profigram Transilvania SRL;

Purpose of data processing: Operation of the business on the basis of the written agreement of the contracted partners.

Legal basis for processing: processing based on a contract and the fulfilment of a legal obligation on the basis of [Article 6(1)(b) and (c) of the GDPR].

Scope of processed data: first and last name, telephone number, e-mail address, company name; tax number, company registration number, billing address, delivery address, data necessary for the identification of the contact person, transferor and recipient, other technical data necessary for the performance of the task (e.g. doorbell number).

Duration of data processing: the data provided by the data subject will be stored for eight years in accordance with the Accounting Act.

5.1.4 Data management of the BLOG interface of the www.profigram.ro website

Profigram Transilvania S.R.L (407035 Apahida, Libertății street,156/3, Cluj " is the data controller.

The data controller shares with the visitors of the website information that is important and worth mentioning in the field of the service in the world of information technology. In order to access these data, the Data Controller does not request a special login, and does not store any data related to the Data Subject when visiting the website, only for the security of the system and traceability anonymous information in order to carry out possible follow-up investigations. It is not possible to comment on the posts in an interactive way on the blog interface, so direct data processing is not carried out on this

interface.

Purpose of data processing: to share news and interesting facts with the data subject (website visitor).
Legal basis of data processing: no data processing, only anonymous data related to server logging are stored on the BLOG interface.

Scope of data processed: no data processing, only anonymous data related to server logging are stored on the BLOG interface.

Duration of data processing: no data processing, only anonymous data related to server logging are stored on the BLOG interface.

5.2 CONTACTING THE DATA CONTROLLER

5.2.1 Customer correspondence of Profigram Transilvania S.R.L

Profigram **Transilvania S.R.L.** All e-mails received by the sender will be deleted after a maximum of 10 years from the date of publication, together with the sender's name, e-mail address, date, time and other personal data provided in the message.

In addition, the following information can be found in all our e-mails:

*"Profigram **Transilvania S.R.L** the Privacy Policy prepared on the basis of the relevant provisions of the EU-GDPR 2016/679 and Act CXII of 2011 (Privacy Act), as **amended (www.profigram.ro website "Data protection") in its e-mail.**"*

Controller of personal data: Profigram Transilvania S.R.L;

Purpose of data processing: to contact and provide communication related to the business process by electronic mail.

Legal basis of data processing: data processing based on consent by using the service and in order to ensure the legitimate interest of the data controller for the sake of provability.

The type of personal data processed is the sender's name, telephone number, e-mail address, date values and other time data, as well as other personal data and information provided in the message.

Duration of data processing: 10 years.

Data processors:

| Name | Registered Office | Data Processing Tasks |
|------------------------------|---|--|
| PROFIGRAM TRANSILVANIA S.R.L | 407035 Apahida, Libertății street, 156/3, Cluj | The data controller using the electronic mail system |
| Microsoft Office 365 | Microsoft Hungary Ltd., 1031 Budapest, Graphisoft Park 3. (Záhony Street) | Providing email services and storing electronic emails and documents |

5.2.2 Apply for job postings

Profigram Transilvania S.R.L, as an employer, also advertises jobs independently and, if necessary, uses the services of employment agencies to perform the tasks. In such cases, the **employment agencies and Profigram Transilvania S.R.L** as **joint data controllers, process** the personal data sent by the employment agencies.

Profigram **Transilvania S.R.L** It is committed to the lawful processing of personal data, so it informs the data subjects that during the selection process and for one year thereafter, the data subjects will continue to process your personal data for the purpose of personnel selection, unless the data controller orders otherwise at the request of the data subject.

Profigram **Transilvania S.R.L** stores and processes the CVs and/or application documents of job

applications received by him/her.

Profigram Transilvania SRL, as the employer data processor, informs the data subjects as follows:

Purpose of data processing: Profigram **Transilvania SRL** Applying for a job at the European Immigration Service, participating in the selection procedure.

Legal basis of data processing: the voluntary consent of the data subject given by the data controller.

The types of personal data processed are: name, permanent address, place of residence, telephone number, e-mail address, place and date of birth, as well as uploaded or sent photos, cover letters, CVs, applications, as well as other personal data and information provided therein.

Deadline for the deletion of data: a maximum of one year from the submission of the application by the data controller. **Possible consequences of failure to provide data:** the data subject will not be able to apply to **Profigram Transilvania S.R.L** posted by the Workers' Association.

Joint data controllers:

| Name | Registered Office | Data Processing Tasks |
|------------------------------|---|---|
| PROFIGRAM TRANSILVANIA S.R.L | 407035 Apahida, Libertății street, 156/3, Cluj | Management of job offers posted on the company's website. |
| LinkedIn.com | 1000 West Maude Avenue Sunnyvale, CA 94085 USA | Management of resumes received for job offers posted on LinkedIn, as well as the provision of Profigram Transilvania S.R.L.'s LinkedIn page. LinkedIn's own data processing notice: https://www.linkedin.com/legal/copyright-policy |
| Facebook.com | 1 Hacker Way, Menlo Park, California 94025, 1601 WILLOW ROAD MENLO PARK, CA 94025 | Management of resumes received for job offers posted on Facebook, as well as the provision of Profigram Transilvania S.R.L.'s Facebook page. Facebook's own data processing notice: https://www.facebook.com/privacy/explanation |

5.2.3 Data management of our TALENT Program

Profigram Transilvania S.R.L considers it important to provide talented, committed, eager-to-learn, and interested job seekers in the Hungarian labor market with opportunities that present the right challenges for them and best meet their needs and personality. Therefore, within the framework of our TALENT program, applicants (data subjects) may share their resumes with us, which (and its content) is processed ONLY by Profigram Transilvania S.R.L. as the data controller.

Profigram **Transilvania S.R.L** is committed to the lawful processing of personal data, so it informs the data subjects that during the voluntary participation in the TALENT program, and for 30 days after unsubscribing, the data subjects will continue to process your personal data for the purpose of recruitment, unless the data subject orders otherwise.

Profigram **Transilvania S.R.L** stores and processes the CVs and/or application documents of job applications received by him/her.

When developing our data management, we took into account the provisions of the GDPR and the 2016_11_15_Tajekoztato of the National Authority for Data Protection and Freedom of Information (NAIH)... Pdf. and the positions formulated in the NAIH-2018-2570-2-V.pdf.

Profigram Transilvania S.R.L, as the responsible party for the TALENT program (data controller), informs the data subjects as follows:

Purpose of Data Processing: Based on the data provided in the applicant's resume, the examination results conducted within the Profigram Transilvania S.R.L.TALENT program, and the recommendation of workplace tasks and training opportunities.

Legal Basis for Data Processing: The data subject's voluntary consent provided through the completion of the TALENT application.

Types of Personal Data Processed: Name, permanent address, place of residence, phone number, email address, place and date of birth, as well as uploaded or sent photos, cover letters, resumes, applications, and any other personal data and information provided within them.

Data Deletion Deadline: The data processing will be ongoing during participation in the TALENT program, and the data will be deleted within a maximum of one month after the applicant withdraws.

Consequences of Failing to Provide Data: The data subject will not be able to participate in the Profigram Zrt. TALENT program.

Joint data controllers:

| Name | Registered Office | Data Processing Tasks |
|------------------------------|--|---|
| PROFIGRAM TRANSILVANIA S.R.L | 407035 Apahida, Libertății street, 156/3, Cluj | Management of job offers posted on the company's own website. |

5.3 OTHER DATA PROCESSING

5.3.1 PROCESSING AND TRANSFER BASED ON LEGAL OBLIGATION

In cases of data processing not listed in this notice, we will provide information at the time the data is collected. We inform our customers that the court, prosecutor, investigative authority, misdemeanor authority, public administration authority, the National Authority for Data Protection and Freedom of Information, or other authorities authorized by law may request information, data sharing, transfer, or providing documents to the data controller.

Profigram Transilvania S.R.L will only provide personal data to authorities to the extent and only as necessary to fulfill the purpose of the request, provided that the authority specifies the exact purpose and scope of the data.

Profigram **Transilvania S.R.L.**, as a **contracting partner**, based on the position of Working Group 29 of the European Union (EU Central Data Protection Authority) **wp249_hu (Data Processing in the Workplace) and the information provided by NAIH/2018/2570/2/V**, it processes and/or transfers the data of its contracted partners and its own employees to a third party.

It does this for the reason that **Profigram Transilvania S.R.L** and to ensure the primary purpose of its contracted partners, the successful operation of business processes, by providing the personal data necessary for the maintenance of human relations and the identification of business contacts.

This activity may be aimed exclusively at the fulfilment of the employer's duties, so the transfer of personal data may only take place in order to ensure contact and the business process. The personal data obtained and/or transferred in this way will be collected **by Profigram Transilvania S.R.L.** and is not used for any other purpose by its contracted partner. This activity may be aimed exclusively at the fulfilment of the employer's duties, so the transfer of personal data may only take place in order to ensure contact and the business process. The personal data obtained and/or transferred in this way **will be collected by Profigram Transilvania S.R.L** and is not used for any other purpose by its contracted partner.

Data Controller: Profigram Transilvania S.R.L

Purpose of Data Processing : To manage Profigram Transilvania SRL business processes and ensure contractual and quality for its partners.

Legal Basis for Data Processing: Ensuring the legitimate interest of the employer(GDPR Article 6(1)(f)).

Types of Personal Data Processed:

- Employee's name
- Employee's company email address
- Employee's work phone number

Employee's personal identification card number or other specific unique identifier, if necessary for identification.

Data Retention Period: Until the task is completed and/or during the operation of the business process.

Data Processor: Employees of the contracting parties.

Additional Data Controllers: Profigram Transilvania S.R.L. and its contracted partners as joint data controllers.

5.3.2 PROFIGRAM TRANSILVANIA S.R.L INCIDENT MANAGEMENT

According to Article 85 and Chapter I, Article 33 of the GDPR, Profigram Transilvania S.R.L, as the data controller, must notify the supervisory authority referred to in Article 55 without undue delay and, if possible, within 72 hours after becoming aware of a personal data breach, unless the data breach is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, the reasons for the delay must also be provided.

Profigram Transilvania S.R.L as the data controller, has conducted an independent IT and data security audit of its IT systems and personal data processing processes and considers the following security events as data breaches:

- In relation to personal data processed in the systems specified in point 5, when an event occurs as per Article 4(12) (loss of confidentiality for any reason and in any manner);
- In relation to personal data processed and/or collected on the www.profigram.ro website, when an

event occurs as per Article 4(12) (loss of confidentiality for any reason).

6 DOCUMENT DATA

This document is a document issued and registered in the internal records of Profigram Transilvania S.R for EXTERNAL data processing. Version number: 4.0; Document responsible: Csaba Gábor Váraljai – Data Protection Officer; Prepared by: Csaba Gábor Váraljai – Data Protection Officer; Issue date: 2023.02.01; Document ID: PRGR-TÁJ-2023-026-KAKT-4.0

7 VERSION CONTROL

| Version | Date | Brief description of the modification | Modified by |
|----------------|-------------------|--|---|
| 1.0 | 2019.04.05 | The First version | Váraljai Csaba Gábor EU-GDPR DPO |
| 2.0 | 2021.03.01 | Second Version, tracking of changes | Váraljai Csaba Gábor EU-GDPR DPO |
| 3.0 | 2022.06.01 | Third version, annual review” | Váraljai Csaba Gábor EU-GDPR DPO |
| 4.0 | 2023.02.01 | Fourth version, annual review | Váraljai Csaba Gábor EU-GDPR DPO |

