

**Chef Market Élelmiszer Nagykereskedelmi
Zártkörűen Működő Részvénytársaság**

DATA PROTECTION AND PROCESSING REGULATIONS

1. The aim of the regulations

The aim of present regulations is to set the data protection and processing policy applied by **Chef Market Élelmiszer Nagykereskedelmi Zártkörűen Működő Részvénytársaság** (registered office: 2161 Csomád, József Attila utca 73.; registration number: 13-10-041674; hereafter: **Company**)

When setting present regulations the Company specifically considered the Fundamental Law; the 2001. CVIII. (Infotv.) law about certain issues related to the electronic commercial services and information society; the 2011. CXII. (Infotv.) law about the right to information self-determination and the freedom of information; the 1988. VI. law about the announcement of the Strasbourg 28th January 1981 treaty about the protection individuals with regard to automatic processing of personal data; and the EU 2016/679 Regulation (GDPR).

2. Terms

Personal Data: is any information relating to an identified or identifiable natural person ('data subject'); such as a name, identification number, location data, an online identifier, or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person, and any other personally identifiable information of the data subject which is not of public interest or public out of public interest. Personal Data are – among others – the name, address and e-mail address.

Consent: freely given and explicit consent of the data subject which is based on proper information and with which the data subjects agrees to the complete or partial processing of the relevant personal data.

Right to object: the statement of the data subject in which objects to the processing of his or her personal data and requires the data processing to be finished and the processed data to be erased.

Data Controller: the natural or legal person, or entity as a legal person who on its own or together with other entities determines the purpose of data processing, makes and carries out the decisions about the data processing (including the devices used) or delegates it to the Data Processor commissioned by the Data Controller.

Data Processing: any operation performed on personal data, whether or not by automatic means, including collection, recording, systematization, storage, changing, use, query, forwarding, publication, synchronization or connection, blocking, erasure and destruction, and the prevention of the further usage of the data, taking photograph or sound-recording, or recording physical characteristics (fingerprint, palm print, DNA sample, iris picture) suitable for the identification of the data subject.

Data Processing Methods: technical tasks related to Data Processing

Data Erasure: making data unidentifiable in a way that they cannot be restored.

3. Personal Data Processed

Personal Data given by the data subjects by means of reception:

Contracting:

- **Supplier contracts.** Data subjects provide the copy of the identification papers of the person, in case of natural persons and of the person entitled to represent the company if they are companies. The processed data are: name, birth name, address, e-mail address, phone number, place of residence, mother's name, place and date of birth, number of identification papers.
- **Customer contracts and credit limit contracts.** Data subjects provide the copy of the identification papers of the person, in case of natural persons and of the person entitled to represent the company if they are companies. The processed data are: name, birth name, address, e-mail address, phone number, place of residence, mother's name, place and date of birth, number of identification papers.
- **Delivery and subcontractor contracts.** Data subjects provide the copy of the identification papers of the person, in case of natural persons and of the person entitled to represent the company if they are companies. The processed data are: name, birth name, address, e-mail address, phone number, place of residence, mother's name, place and date of birth, number of identification papers.
- **Employee contracts.** Data subjects provide the copy of the identification papers. The processed data are: name, birth name, address, e-mail address, phone number, place of residence, mother's name, place and date of birth, number of identification papers.

Entering the company's registered office or premises:

- **Security service** registers every visitor. The processed data are: name, address, licence plate number, company name, purpose of visit, and in case the use of breathalyser, its result.
- **Delivery of goods.** The personal identification papers of the deliverer are copied. The processed data are: name, birth name, address, e-mail address, phone number, place of residence, mother's name, place and date of birth, number of identification papers.

Website

- The company website can be visited without giving Personal Data. The company does not collect or process the Personal Data of the visitors. Registration requires e-mail address, name and phone number. In case of the usage of the web shop invoicing requires the postal address as well.
- Data technically recorded while operating the system are the data of the user's computer which are generated while using the services and which the data processing system records as an automatic result of technical processes. The automatically recorded data the system logs without the special statement or activity of the user. These data together with other personal user data cannot be connected and are only accessible for the data processor – except for cases under the obligation of the law.

4. Data Transfer, Data Processing

Personal Data received by Data Processor the Company cannot transfer to a third party without the preliminary consent of the User in any way, except for cases when the Company is obliged by the law to transfer the Data. The basic forum used for data registry is the SHERPA company management system.

Personal Data are accessible to people the Data Processor holds in respect – especially representatives and employees – who need them for their work and who are aware of the obligations related to data processing and management.

Data Processor is entitled and obliged to transfer to the relevant authorities all available and properly stored Personal Data which they are obliged to transfer by the law or legally binding authority regulations. Data Processor has no responsibility concerning such data transfers and the consequences deriving from them.

Data Processor also keeps a register in order to control the legality of the data transfer and to inform the data subject. The register contains the date of the transfer of Personal Data managed by Data Processor, the legal basis and the addressee of the transfer, the circle of the Personal Data transferred and all other data set in the Data Processing Regulations.

Data Processor takes all necessary measures to ensure the safe and undamaged processing of the data and the set up and operation of the data processing systems required to do so. Data Processor makes sure no unauthorised persons could have access to the processed data and they could not publish, transfer, modify or erase the data.

Data Processor commits to provide the most modern and most suitable technical equipment and security regulations to protect the security of the data, especially that no unauthorised persons could have access to the data, the data would not be published, erased or destroyed illegally. Data Processor takes all measures that the data would not be accidentally damaged or destroyed. The above commitment Data Processor ordains for the employees participating in the data processing activity.

Data Processor in no circumstances will collect special data, meaning data reflecting to race, nationality, ethnicity, political views and party engagement, religious or other ideology, representative organisation membership, health status, addiction, sexual life or criminal record.

5. Right to a judicial remedy

Data subject is entitled to request information about the processing of his or her Personal Data and can ask for the modification or erasure of his or her Personal Data – except for the Data Processing set by the law – by sending an electronic mail to adatkezeles@chefmarket.hu or by sending a statement addressed to the Company and posted to the registered office of the Company.

Upon the request by the data subject the Company gives information about the data processed by the Company or about the data processed by the Data Processor commissioned by the Company, and also about the purpose, legal basis and time of the data processing as well as the name, address (or registered office) and the relevant activity of the commissioned Data Processor, and about who and on what purpose will receive or have received the data. The Company as Data Processor provides

information in writing in a clear and intelligible way within the shortest possible time, but within 30 calendar days the latest after the request have been received. Information providing is free of charge if the person requesting information has not submitted to the Company another request for information regarding the same field in the current year. In any other cases the Company is entitled to reimbursement.

The Company immediately erases Personal Data if (1) the data subject requires it by sending an electronic mail to adatkezeles@chefmarket.hu or by sending a statement addressed to the Company and posted to the registered office of the Company; (2) if the data processing is illegal; (3) the purpose of the data processing ceases to exist; (4) the term of data storage set by the law expires or it is ordered by the court or the authority (NAIH).

The Company informs the data subject about any modification and erasure in e-mail, only if considering the purpose of the data processing the rightful interest of the data subject is not fringed, the Company can omit the information.

After receiving the objection the Company – jointly with suspending data processing – will examine the case as soon as possible, but within 1 calendar days the latest, and will inform the data subject about the result of the examination in writing. If the objection is rightful, the Company stops data processing. If the data subject does not agree with the decision of the Company, an appeal can be submitted to the court or to the NAIH (Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C., website: <http://www.naih.hu>) within 30 calendar days after being informed about the decision. If necessary, considering the complexity and the number of requests, the deadline can be expanded by two further months.

The data subject is entitled to receive the personal data previously given to a data Processor relevant to the data subject in a typed, legible form and to forward them to another Data Processor without being obstructed by the Data Processor to whom the data subject originally gave the personal data.

The Company cannot erase the data of the data subject if the data processing is set by the law. The data subject can sue the data Processor at court in case of the infringement of his or her rights.

The Company retains the right to change the present regulation, and to modify it appropriately in case of the changes of the Hungarian or EU regulations.

The Data Processing Officer of the Company is Dr Richárd Andrejszki, General Manager.

Present Regulations come into force on 24th May 2018.