

## **PRIVACY POLICY**

for the visitors of the Plasticor.hu website using the relevant parts of the  
Data Protection Policy of Plasticor Kft

PLASTICOR  
Plastic injection moulding Kft.

## 1. Preamble

PLASTICOR Műanyagfeldolgozó Kft. (Registered office: 8200 Veszprém, Veszprémvölgyi u. 22., cg .: 19-09-507-570, hereinafter: Data Controller), as Data Controller<sup>1</sup>, considers the protection of the privacy of website visitors (hereinafter: User) to be extremely important, therefore Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data<sup>2</sup> and on the free movement of such data and repealing Regulation (EC) No 95/46 (General Data Protection Regulation) ) in accordance with the provisions of the Data Protection Act (hereinafter: the Prospectus). The Data Controller treats personal data<sup>3</sup> confidentially and takes all security, technical and organizational measures that guarantee the security of the data.

The data controller informs natural persons about the principles, process and guarantees of data management. The controller recognizes the right of natural persons to control their own personal data. At the same time, he draws attention to the fact that the right to the protection of personal data is not an absolute right, it must be taken into account and balanced with other fundamental rights in accordance with the principle of proportionality.

The Data Controller has created its Data Management Regulations in order to comply with the applicable European and Hungarian legal regulations, which serve as the basis for the Prospectus. The current version of the Privacy Policy is available on paper at the Data Controller's registered office.

In defining the data management<sup>4</sup> principles of the Data Controller, the following legislation in particular, but not exclusively, shall be taken into account:

- The Basic Law of Hungary
- 2011 CXII. Act - On the right to information self-determination and freedom of information (Infotv.)
- Act V of 2013 - On the Civil Code (Civil Code)
- 2016 CPLASTICOR Plastic Processor. Act on the Code of Civil Procedure (Pp.)
- 1997 CLV. Act - On Consumer Protection (Fgytv.)
- Act C of 2012 - On the Penal Code (Criminal Code)
- XIX. Act - On Criminal Procedure (Be.)
- Act C of 2000 - On Accounting (Act on Accounting)
- 2008 XLVIII. Act on the Basic Conditions and Certain Restrictions of Commercial Advertising (Gr.)
- XLVII of 2008 Act - Prohibition of Unfair Commercial Practices against Consumers

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<sup>1</sup>Data controller: any natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law.

<sup>2</sup> Personal data: any information relating to an identified or identifiable natural person ("Data Subject") (eg name, telephone number, online identifier, location data, portrait, voice, etc.);

<sup>3</sup> . Data subject: any natural person identified or identifiable, directly or indirectly, on the basis of personal data (eg interested party, recipient, debtor, etc.);

<sup>4</sup> Data management: any operation or set of operations on personal data or files, whether automated or non-automated, such as collecting, recording, organizing, segmenting, storing, transforming or altering, querying, accessing, using, transmitting or otherwise making available, coordination or interconnection, restriction, deletion or destruction.

- 2001 CVIII. Act on Certain Issues in Electronic Commerce Services and Information Society Services
- 1995 CXIX. Act - On the management of name and address data for the purpose of research and direct business acquisition

## 2. Person of the Data Controller

For the purposes of these Regulations, the following are considered to be Data Controllers:

A) Company name: PLASTICOR Műanyagfeldolgozó Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság

Headquarters: 8200 Veszprém, Veszprémvölgyi u. 22.

Company registration number: 19-09-507-570

Tax number: 13273866-2-19

Address of actual data management: 8200 Veszprém, Ipar u. 4-6. Phone number: +36 88 328 296

E-mail: kl@plasticor.hu, sales@plasticor.hu

Website: www.plasticor.hu

B) All Employees employed by the Data Controller, for whose activities the Data Controller assumes full responsibility towards the Data Subject and third parties<sup>5</sup>.

C) The Data Controller is not obliged to appoint a data protection officer pursuant to Article 37 of the Regulation.

### 3. The scope of personal data processed during the use of the website, the purpose, title and duration of the data processing

#### Contact

If the User wishes to contact the Data Controller via the website, he / she can do so via the contact form.

	Data managed	Purpose of data management
Mandatory personal information	name	identification of the person initiating the contact
	e-mail address	contact

Legal basis for data processing: voluntary consent of the User pursuant to Article 6 (1) (a) of the Regulation.

Duration of data processing: until the 5th day following the case which is the subject of the ad hoc request.

#### Request for quotation

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<sup>5</sup> Third Party: a natural or legal person, public authority, agency or any other body that is not the same as the Data Subject, the Data Controller, the Data Processor or persons who have been authorized to process personal data under the direct control of the Data Controller or Data Processor.

On the website, it is possible to send a request for quotation via the form provided for this purpose.

Scope of data managed:

	<b>Data managed</b>	<b>Purpose of data management</b>
Mandatory personal information	name	identification of the person initiating the contact
	e-mail address	contact
	tel. Nr.	contact

Legal basis for data processing: voluntary consent of the User pursuant to Article 6 (1) (a) of the Regulation.

Duration of data management: in the absence of the establishment of a contractual relationship, until the 5th day after the failure, in the event of a partnership, until the end of the confidentiality period set out in the contractual documents regulating the legal relationship.

#### **Other personal information logged by the system**

Scope of data managed:

<b>Data managed</b>	<b>purpose of data management</b>
IP adress	An identification number assigned to the User's device by an Internet Service Provider, which is managed by the Data Controller in order to ensure IT security.
Browser type	Send html code for your browser type..

Legal basis for data processing: pursuant to Article 6 (1) (a) of the Regulation, the voluntary consent of the User, having regard to Article 32 of the Regulation.

Duration of data management: The system stores the data marked above for 6 months from the date of their creation and then deletes them automatically.

#### **Management of cookies**

Scope of data managed:

<b>Data managed</b>	<b>Purpose of data management</b>
Recording a page visit	Enhance the user experience

Legal basis for data processing: voluntary consent of the User pursuant to Article 6 (1) (a) of the Regulation.

Duration of data management: Depending on the settings of the User's browser. The User has the option to delete cookies from his own computer or to disable the use of cookies in his browser.

### **4. Principles for the processing of personal data**

The data controller undertakes to act in accordance with the principles in the course of his data management practices.

- Legality

When processing personal data, the Data Controller and the persons directly under their control authorized to process the data must comply with the European Union and domestic legislation in force at any time.

- Fair procedure

During data management, the Data Controller must act in a fair manner, respecting the laws and principles.

- Transparency

The processing of personal data must be carried out in a way that is transparent to those concerned.

- Purposefulness

Any processing of personal data may only take place for a specific, clear and legitimate purpose. These rules define the purpose of data management of the data managed by the Data Controller from the recording of the data to their destruction.

- Data Saver

Based on the purpose limitation principle, data processing should be limited to relevant and necessary data.

- Proportionality

The data controller may restrict the right of natural persons to self-determination of information only for the sake of another right, to the extent necessary. The implementation of the principle of proportionality in specific cases must be accurately documented to support the lawfulness of the data processing.

- Privacy-by-design

During the development of the data manager's data management processes, he / she takes into account the principles of data security and data management, the implementation of which he intends to ensure with the elements built into the process.

## **5. Legality and purpose of data management**

The Data Controller handles personal data in connection with the use of the website with the consent of the Data Subject. Prior to consent, the Data Controller shall inform the Data Subject by acquainting himself with the Prospectus

- the content of the consent,
- about exactly which data, and
- how you contribute to its management,
- the rights of the Data Subject, and
- the possibility and method of withdrawing consent.

The data subject must give consent in a clear, voluntary and documentable manner on the basis of this information.

The Data Controller shall inform the Data Subject that it has been managed on the basis of any voluntary consent they may receive information about their data from the Data Controller at the specified address or by any volunteer they may exercise their rights in this way.

In the case of data voluntarily provided by the Data Subject to the Data Controller without a direct invitation, unless there is another legal basis for data processing, the voluntary consent shall be deemed to have been given in view of the Data Subject's active conduct.

## **6. Rights of the Data Subject and available remedies**

The rights and remedies of the data subject under the Regulation are defined as follows.

The Data Controller shall draw the attention of the Data Subject to take all necessary measures to provide the Data Subject with all information and information concerning the processing of personal data in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner. The Data Subject may request this information in writing by sending a request to the e-mail address kl@plasticor.hu, and shall also ensure the exercise of the Data Subject's rights through other contact details of the Data Controller.

The Data Controller shall immediately, but within one month from the receipt of the Data Subject's request, inform the Data Subject electronically of the measures taken in connection with his or her request. The above deadline may be extended by a further two months, stating the reasons for the delay.

1. Right to information: At the request of the Data Subject, the Data Controller shall provide information on the data processed by him, their source, the purpose, legal basis, duration of the data processing, the circumstances of the data protection incident, its effects and the measures taken to remedy it. The Data Controller shall provide the information in writing in a comprehensible form at the request of the Data Subject as soon as possible after the submission of the request, but no later than within one month. This information is free of charge if the person requesting the information has not yet submitted a request for information to the Data Controller for the same data set in the current year. In other cases, the Data Controller will determine the reimbursement.<sup>6</sup>

2. Right of rectification: Based on the principle of accuracy, the Data Controller shall rectify personal data without undue delay if it does not correspond to reality and personal data corresponding to reality is available to him. Taking into account the purpose of the data processing, the Data Subject is entitled to request the completion of incomplete personal data.<sup>7</sup>

3. Right to delete ("right to forget")<sup>8</sup>: The Data Controller deletes personal data if its processing is unlawful, requested by the Data Subject, the processed data is incomplete or incorrect - and this condition cannot be legally remedied - provided that the deletion is required by law. does not preclude and one of the conditions set out in Article 17 of the Regulation is met:

the. It is no longer necessary to process the data for the purpose for which it was collected.

b. The Data Subject has withdrawn his consent and the Data Controller has no other legal basis for data processing.

c. The Data Subject objects to the data processing and there is no reason to take precedence over the Data Subject's exercise of rights.

d. The data was processed illegally.

e. Legislation requires the deletion of data.

4. Right of access: The Data Subject is entitled to receive feedback from the Data Controller as to whether the processing of his / her personal data is in progress and, if so, to obtain access to the personal data related to the related information specified in the Regulation.<sup>9</sup>

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<sup>6</sup> More detailed information can be found in Articles 13-14. of the Decree. contains an article

<sup>7</sup> More detailed information can be found in Articles 16. of the Decree. contains an article

<sup>8</sup> More detailed information can be found in Articles 17. of the Decree. contains an article

<sup>9</sup> More detailed information can be found in Articles 15. of the Decree. contains an article

5. Blocking and marking (right to restrict data processing): The Data Controller blocks personal data if the Data Subject so requests or if, on the basis of the information available to him, it can be assumed that the deletion would harm the Data Subject's legitimate interests. Blocked personal data may only be processed for as long as the purpose of the data processing, which precluded the deletion of personal data, exists. The Data Controller shall mark the personal data processed by him / her if the Data Subject disputes its correctness or accuracy, but the inaccuracy or inaccuracy of the disputed personal data cannot be clearly established.<sup>10</sup>

6. Right to data portability: If the data processing is based on the consent of the Data Subject or the performance of a contract and the data processing is automated, the Data Subject is entitled to have the personal data provided to him / her and shall have the right to transfer such data to another controller without being hindered by the controller to whom the personal data have been made available. Data manager does not handle automated data.<sup>11</sup>

7. Automated decision-making in individual cases, including profiling: The Data Subject has the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effect or would be similarly significant for him, except with the consent of the Data Subject, the processing of data in order to fulfill the contract, or if the data processing is authorized by law<sup>12</sup>.

8. Informing the Data Subject about the data protection incident: If the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the Data Subject of the data protection incident without undue delay.<sup>13</sup>

9. Right of protest, right of complaint, right of appeal<sup>14</sup>: The Data Subject may object to the processing of his / her personal data if the processing or transfer of personal data is necessary only for the fulfillment of a legal obligation to the Data Controller or the legitimate interest of the Data Controller, data recipient or third party, unless data processing was ordered by law; the use or transfer of personal data is for direct business, public opinion or scientific research purposes; in other cases specified by law.<sup>15</sup>

The Data Controller shall examine the protest as soon as possible, but not later than within 15 days from the submission of the request, make a decision on the merits of the request and inform the applicant of its decision in writing. If the Data Controller finds that the data subject's objection is justified, the data processing, including further data collection and data transfer, shall be terminated and the data shall be blocked, and the protester and the measures taken on the basis thereof shall be notified to all persons to whom the data subject has previously transmitted. and who are obliged to take action to enforce the right to protest.

If the Data Subject does not agree with the decision made by the Data Controller, he / she may file a lawsuit against it - within 25 days of its notification.

The Data Controller may not delete the data of the Data Subject if the data processing has been ordered by law. However, the data may not be transferred to the data recipient if the Data Controller has agreed to the protest or the court has established the legitimacy of the protest.

If the Data Controller fails to act on the Data Subject's request, it shall inform the Data Subject without delay, but no later than within one month of receipt of the request, of the reasons for the failure to act and of the Data Subject's complaint to the competent supervisory authority.

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<sup>10</sup> More detailed information can be found in Articles 18. of the Decree. contains an article

<sup>11</sup> More detailed information can be found in Articles 20. of the Decree. contains an article

<sup>12</sup> More detailed information can be found in Articles 22. of the Decree. contains an article

<sup>13</sup> More detailed information can be found in Articles 34. of the Decree. contains an article

<sup>14</sup> More detailed information can be found in Articles 78-79. of the Decree. contains an article

<sup>15</sup> More detailed information can be found in Articles 21. of the Decree. contains an article

In case of violation of your right to information self-determination, you can file a complaint or complaint:

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

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

In case of violation of minors' insulting, hateful, exclusionary content, rectification, the rights of a deceased person, the rights related to the violation of reputation, you can file a complaint or a complaint:

National Media and Communications Authority 1015 Budapest, Ostrom u. 23-25. Mailing address: 1525. Pf. 75  
Tel: (06 1) 457 7100

Fax: (06 1) 356 5520 E-mail: [info@nmhh.hu](mailto:info@nmhh.hu)

## 7. Information Security

The data controller is obliged to ensure the security of the data. According to the principle of “privacy-by-design”, the data controller takes into account the requirement of data security during the development of its entire data protection process.

The purpose of the data controller is to minimize the processing of personal data in order to reduce data management risks. The data controller handles the personal data processed in a transparent and verifiable manner in order to detect data protection incidents immediately.

In the data security responsibilities of a data controller

- take technical and organizational measures to ensure the storage of electronically stored data
- ensures the enforcement of data security rules required by law
- ensures the enforcement of data protection and confidentiality rules
- prevents unauthorized access to data
- take the necessary measures to prevent data corruption
- promotes data management awareness for its employees to ensure data security
- ensures the physical protection of devices used for electronically stored data
- ensures that data is backed up regularly
- ensures that access to the data is restricted to those who have access to it

A data breach is considered a privacy incident.



## **8. Privacy Incident**

In the event of a data protection incident, the Data Controller shall follow the procedure set forth in the Prospectus.

At the data controller, the appointed data protection officer is Kornél Bódy, who is obliged to act during the handling of the data protection incident.

The data protection incident must be reported immediately by the detector to the data protection officer. If the data protection incident is detected by the Data Processor, it shall immediately notify the Data Controller.

If a privacy incident is detected, the Data Controller will take the following steps:

- A. Recording the circumstances of the data protection incident, recording a data sheet (facts, effects, mitigation measures).
- B. Assess the incident and decide what data protection risk the data protection incident poses to the data being processed.
- C. Immediate reporting of the incident to the authority, within 72 hours at the latest, unless the assessment does not jeopardize the rights and freedoms of natural persons.
- D. If the incident is likely to pose a high risk to the rights and freedoms of natural persons, the Data Controller shall be notified immediately.
- E. Take risk mitigation measures.
- F. Evaluate the data protection incident, take measures to avoid further incidents.

The data controller shall keep a record of data management incidents, which shall include all relevant circumstances of the case.

## **9. Final provisions**

The Privacy Policy that forms the basis of this Prospectus is a copyright work, therefore copying, use, processing or sale of the Prospectus, in whole or in part, is also illegal and prohibited. The Data Controller draws attention to the fact that in case of illegal use of this Prospectus, either in part or in full, the Author is entitled to a penalty in the amount of HUF 40,000 / page. In the event of a copyright infringement, the author reserves the right to assert damages arising from the infringement against the infringer.