PRIVACY POLICY

of

WTS Klient Gazdasági Tanácsadó Korlátolt Felelősségű Társaság

(hereinafter: Privacy Policy)

Effective as of 11 September 2023

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1. Data Controller

Data Controller	WTS Klient Gazdasági Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Stefánia út 101-103; company registration number: Cg.01-09-730729; hereinafter: **Data Controller**)
Representatives of the Data Controller and their contact information	Zoltán Lambert managing director email: zoltan.lambert@wtsklient.hu Pásztor Andrea managing director email: andrea.pasztor@wtsklient.hu
Email address of the Data Controller	email: info@wtsklient.hu
Webpage	https://wtsklient.hu/

Social media	Facebook	https://www.facebook.com/wtsklient/
	LinkedIn	https://www.linkedin.com/company/wts-hungary/
	YouTube channel	https://www.youtube.com/channel/UC3O9kDMnXDNsf4zNZfH9E8w
	XING	https://www.xing.com/pages/wtsklientungarn
	Instagram	https://instagram.com/wtsklient

2. Definitions

For the purposes of this Privacy Policy:

2.1 *data subject* means the natural person identified or identifiable on the basis of his / her personal data, including but not limited to the natural person who

- subscribes to the newsletter of the Data Controller,
- contacts the Data Controller via post, telephone, via email by sending an email to the info@wtsklient.hu email address, by giving its personal data on the webpage or a social media platform for the purpose of requesting information and/or a proposal,
- submits his / her application to the Data Controller for an open position / trainee programme and / or including it in the applicant database of the Data Controller.

2.2 *personal data* means any information relating to an identified or identifiable data subject. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.3 *Data Controller:* Please see Section 1. of this Privacy Policy.

2.4 *data processing* means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.5 data processor means a natural or legal person, which processes personal data on behalf of the data controller. The list of data processors is attached under this Privacy Policy under Annex 1.

2.6 *consent* of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the controlling of personal data relating to him or her;

2.7 *Authority* means the National Authority for Data Protection and Freedom of Information (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság).

3. Data controlling practice of the Data Controller

The Data Controller is committed to the protection of personal data of data subjects and respects their right to informational self-determination.

In order to secure the rightful, fair and transparent controlling of the personal data of data subjects, the Data Controller presents in detail its data controlling practice in this Privacy Policy concerning the data controlling activities specified in this Privacy Policy.

The Data Controller declares that his data controlling practice has been formed based especially on the following laws:

- 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 (hereinafter: **GDPR**)
- Hungarian Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information;
- Hungarian Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

The Data Controller emphasizes that his data controlling practice corresponds to the legislation in force and complies with the best practices of the Authority. With respect thereof, the Data Controller reviews his data controlling practice regularly.

The privacy policy in force can be found under the following links https://wtsklient.hu/en/data-protection-declaration/ and https://wtsklient.hu/de/datenschutzmitteilung/ and the printed version thereof can be found in 1143 Budapest, Stefánia út 101-103.

4. Principles

The Data Controller complies with the following principles during his data controlling practice:

Principle	Fulfilment of the principle in the controlling practice of the Data Controller
Lawfulness, right to a fair trial and transparency	The Data Controller acts in compliance with the legislation in force and respects the right of data subjects to protection of personal data and to informational self-determination. The Data Controller prepares perspicuous, easy-to-read privacy policy in a table form for each controlling activity. In the preparation of the Privacy Policy, the Data Controller applies Q&A format. The Data Controller ensures that the privacy policy in effect is accessible for data subjects in electronic and in printed form.
Purpose limitation	The Data Controller determines precisely the purpose of the data controlling for each data controlling activity and the purpose of data controlling with regard to the different data categories. The Data Controller is not entitled to use the personal data for a different purpose.
Data minimisation	The Data Controller endeavours to process exclusively the personal data that are required for the performance of the purposes defined for each data controlling activity.
Accuracy	The Data Controller reviews the processed data regularly and, in case of inaccuracy, it rectifies or erases them.
Storage limitation	The Data Controller defines the term of the data controlling for each data controlling activity. The Data Controller stores the personal data as long as it is necessary for the purposes of which the personal data are processed.
Integrity and confidentiality	The Data Controller endeavours to ensure the appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage of data, by using appropriate technical and/or organisational measures.
Accountability	The Data Controller shall be responsible for, and be able to demonstrate compliance with, the present principles. For the sake of this goal the Data Controller intends to document its data controlling practice in as much detail as possible.

5. Rights of data subjects and exercise of rights

5.1 Rights of the data subject

What are the rights of the data subjects?	According to Sections 12-22 of the GDPR, the data subject has the following rights concerning the data controlling activity contained in this Privacy Policy. The data subject can:

- ask for information concerning the controlling of his/her personal data (*right to be informed*)

- in certain cases, the data subject may exercise the right to data portability (*right to data portability*)

- ask for rectification of the data in case it is incorrect, inaccurate or incomplete (*right to rectification*)

- ask for the deletion of his/her personal data in case they are no longer necessary or the controlling is unlawful (right to erasure)
-
- in certain cases, ask for the restriction of the data controlling (right to restriction of data processing/ to blocking)

- the erasure of data is needed for the fulfilment of a legal obligation prescribed in the laws of a member state or the European Union and applicable to the Data Controller.

Rights of information (right to access)

The data subject shall have the right to know whether personal data are stored concerning him or her by the Data Controller and has the right to obtain the following information:

- the categories, the legal basis, the purpose and the duration of data controlling;
- circle of person that can have access to the data of the data subject and the circumstances, legal basis for such data transmissions;
- source of personal data;
- if the Data Controller uses automized decision and the process and logic of it, including profile creation;
- the fact of data protection incident, its circumstances, influence and the steps for remedying it;
- the rights and the exercise of rights of data subjects concerning the data controlling.

Right to data portability

In case the data controlling is based on consent or contract and the data controlling is carried out in an automated way (i.e. in a non-paper form) the data subject shall have the right to

(i) receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format (for example in a .doc, .pdf format) and

(ii) to transmit those data to another controller without hindrance from the Data Controller.

	In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
Right to rectification	In case the data subject believes that the personal data concerning him / her are inaccurate, erroneous or incomplete, the data subject shall have the right to request the Data Controller the rectification or the completion of the concerned data.
Right to erasure (right to be forgotten)	The data subject shall have the right that upon his / her request the Data Controller erases the personal data concerning him / her in the following cases: - further processing is not required for the purposes set out in this Privacy Policy; - the purpose of data controlling set out in this Privacy Policy no longer exists or the duration of the data controlling period stipulated by law expired; - if the data subject withdraws his/her consent to the data controlling and a prior legal basis for processing no longer exists; - the Data Controller processed the personal data unlawfully; - if it is ordered by court or the Authority; - the erasure of data is needed for the fulfilment of requirements ordered by law of the member state or the European Union. Where the Data Controller has made the personal data public and is obliged to erase the personal data in accordance with the above, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are controlling the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data (for example erasure from among search results of browsers). The Data Controller draws the data subject's attention to that personal data cannot be deleted especially if needed for the submission of legal claims the or protection thereof.
Right to restriction of data controlling (right to block)	The data subject shall have the right to obtain from the Data Controller restriction of data controlling where one of the following applies: - the accuracy of the personal data is contested by the data subject (in which case the restriction is for a period enabling the Data Controller to verify the accuracy of the personal data);

- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the data controlling, but the data is required for the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing (in which case the restriction is for the period pending the verification whether the legitimate grounds of the controller override those of the data subject).

Where data controlling has been restricted, such personal data may - with the exception of storage - be processed only with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

The data subject who has obtained restriction of data controlling shall be informed by the Data Controller before the restriction of data controlling is lifted.

Right to object

The data subject has the right to object against the processing of his or her data on the grounds of legitimate interest and may order the Data Controller to stop the processing of his or her personal data, if his or her personal data were used for the following purposes:

- processing is necessary for the purposes of the legitimate interests pursued by the Data Controller, except for the case of mandatory data processing (in this case the Data Controller cannot process the data anymore, except if the Data Controller demonstrates that its compelling legitimate interest overrides the interests or the fundamental rights and freedoms of the data subject or it is necessary for the establishment, exercise or defence of legal claims),
- in other cases stipulated by law.

If the Data Controller finds the objection of the data subject reasoned, it ceases the data processing – including further data record and data transfer –, it blocks the data and informs about the objection the previous transferees and those who shall make measures in connection with assertion of the objection. In case the data subject does not agree with the decision of the Data Controller or the Data Controller misses the prescribed deadline, the data subject may seek judicial remedy within 30 days from the time of the notification of the decision or the last day of deadline.

5.2 Exercise of rights

How can the data subject exercise his / her rights?

The data subject can exercise his or her rights according to the following:

- in writing, by sending it electronically to the following email address: tamas.gyanyi@wtsklient.hu

	- in writing, by post to the following address: 1143 Budapest, Stefánia út 101-103.
Within how many days is the Data Controller obliged to make the necessary measures?	The Data Controller shall take the necessary measures without delay, but latest within 15 days from the receipt/delivery of the claim.
In which form are the data subjects informed by the Data Controller?	- in case of a written request sent by email, the Data Controller informs the data subject via email, unless it is expressly requested by the data subject otherwise - in case of a written request sent by post, the Data Controller informs the data subject in a letter sent by post, unless it is expressly requested by the data subject otherwise
What kind of measures are taken by the Data Controller?	The Data Controller - gives information, - erasures / rectifies / restricts (blocks) the data, or - makes other measures in accordance with the request of the data subject, if no ground for exclusion exists. Besides the data subjects, the Data Controller informs the persons to whom previously the data was transferred or given for the purpose of processing, of the rectification, erasure, blocking of data controlling. Upon request of the data subject, the Data Controller informs him / her about these addressees. The Data Controller dismisses this information requirement, if it does not harm the legitimate interest of the data subject with regard the purpose of the data controlling.
What happens, if rights cannot be exercised?	The latest within 15 days from the delivery/receipt of the claim, the Data Controller shall inform the data subject in writing also if the data subject cannot exercise his/her rights for any reason. The Data Controller shall designate - the matters of fact and law, why the rights cannot be exercised, and - the remedies available for the data subject (juridical remedy, lodging a complaint with the Authority).
Where can the data subject seek remedies?	1. *Judicial remedy* In case of any violation of the data subject's rights, he or she may seek judicial remedy. The action may fall within the competence of the tribunal according to his/her home address or his/her residence, depending on his or her choice.

2. *Complaint with the Authority*

The data subject may lodge a complaint with the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)

address:	1055 Budapest, Falk Miksa utca 9-11.
postal address:	1374 Budapest, Pf. 603.
telephone:	+36 (1) 391-1400
telefax:	+36 (1) 391-1410
web page:	http://www.naih.hu
email address:	ugyfelszolgalat@naih.hu

6. Activities affected by data controlling

6.1 Sending application for an open position / trainee programme published by the Data Controller and / or to the applicant database of the Data Controller

Who is the data subject?	Data subject is the applicant, who sends his / her application for the purpose(s) described in this Privacy Policy.
Scope of processed data and purpose of data controlling	The Data Controller processes the application sent by the applicant (data subject) to the open position / trainee programme or the applicant database for the following purposes: - application for open position / trainee programme, the consideration of the application, information and / or - informing the applicant (data subject) about future job offers which might fit the qualification and professional background of the applicant (data subject).
Processed data	The Data Controller processes the personal data of the applicant which were given by the data subject in connection with the application for an open position / trainee programme published by the Data Controller and / or to the applicant database of the Data Controller:

(i)	name, place and date of birth	identification
(ii)	image	identification
(iii)	address, email address, telephone number	contact
(iv)	information about studies	information required for the scope of the job
(v)	information regarding previous jobs	information required for the scope of the job
(vi)	information about language and other skills and competencies	information required for the scope of the job
(vii)	other information listed in the resume	information required for the scope of the job
(viii)	the result of a professional and / or a language test, if the applicant fills in a professional and / or a language test	information required for the scope of the job

	(ix) note prepared by the Data Controller in the interview concerning the applicant (data subject)	information required for the scope of the job
	(x) any information voluntarily provided by the applicant (data subject)	information willing to be shared expressly by the data subject
What is the source of the data?	The applicant (data subject) submits the Data Controller himself / herself his / her resume electronically, during the interview and as a result of filling in the professional and / or language test.	
What is the method of data controlling?	The data are controlled in electronic and printed form.	
Does the Data Controller inspect applicant's (data subject's) profile created on any social media platform during the recruitment process?	The Data Controller (Data Processor) may inspect the applicant's (data subject's) Facebook and / or LinkedIn profile during the recruitment process. The Data Controller (Data Processor) inspects the part of the publicly available and accessible profile created on the social media platform being relevant from the perspective of the position. Data Controller (Data Processor) does not search in closed groups or other non- or partially non-public places for information about the applicant (data subject). The Data Controller (Data Processor) may draw conclusions from the profile created on a social media platform, but does not make further operation, for example the Data Controller (Data Processor) does not save or forward the profile of the applicant (data subject) created on a social media platform.	
Joint data controllers	The Data Controller and HLB Magyarország Könyvvizsgáló és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Stefánia út 101-103.; company registration no.: Cg.01-09-683898) define jointly the purposes and means of processing the data. Therefore, they are deemed as joint data controllers, having joint and several liability. Within the framework of the joint data controlling, WTS Klient Gazdasági Tanácsadó Kft. shall be responsible for the performance of recruitment and HR tasks, as well as ensuring the IT infrastructure. The right of access of the data controllers participating in the joint data controlling to the applications shall be limited: each data controller shall be entitled to access the application of the candidates applying for a job at the concerned data controller only, in absence of the consent of the data subject to the data transfer.	
Who is entitled to process the data?	The data may be known and be processed by the Data Controller and those employees / assignees of the data processors whose scope of job / whose task includes the fulfilment of the data controlling purpose(s).	

Which is the legal basis of data controlling (lawfulness of processing)?	if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application	the data controlling is necessary for making the necessary steps initiated by the applicant (data subject) before conclusion of the employment / trainee employment contract [GDPR Article 6. Section (1) Point b)]
	if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application and informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background	the data controlling is necessary for making the necessary steps initiated by the applicant (data subject) before conclusion of the employment / trainee employment contract [GDPR Article 6. Section (1) Point b)] and the freely given consent of the applicant (data subject) [GDPR Article 6. Section (1) Point a)]
	if the purpose of data controlling is informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background	freely given consent of the applicant (data subject) [GDPR Article 6. Section (1) Point a)]
What is the period of data controlling?	if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application	until the closing of the recruitment process or, before that, the erasure on request
	if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application and informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background	based on the declaration of the applicant (data subject) for two years from the closing of the recruitment process or, before that, until the erasure on request
	if the purpose of data controlling is informing the applicant (data subject) about future job offers, which	based on the declaration of the applicant (data subject) for two years from the delivery of the application to the Data

	might fit the applicant's (data subject's) qualification and professional background	Controller or, before that, until the erasure on request

Can the applicant (data subject) withdraw its consent to data controlling?	The Data Controller informs the applicant (data subject), that he / she can withdraw his / her consent to data controlling anytime. The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
Description of the procedure	*(i) Application for open position / trainee programme published by the Data Controller* - The Data Controller publishes its open positions / trainee programme on the following webpage: https://wtsklient.hu/karrier/. The Data Controller might publish its open positions / trainee programmes on carrier portals and might involve contributors as well. - The applicant (data subject) sends his / her resume to the Data Controller electronically on the application form for the open position / trainee programme selected by the applicant (data subject). - The Data Controller inspects the received application from professional aspects, and calls up the professionally adequate applicants for a personal interview. - During the interview a professional and / or a language test might take place depending on the decision of the Data Controller. - The Data Controller informs the data subjects not selected the for the interviews or not engaged that they were not selected for the open position. - Based upon the declaration of the applicant (data subject) made after the closing of the recruitment process, the Data Controller a) destructs the application eventually received in a paper form, provided that the applicant (data subject) did not request to send that back via post; b) erasures the application received in an electronical form, and destructs the data existing in a paper form; or c) processes the application for two years from the closing of the recruitment process / the delivery of the application to the Data Controller or, until its erasure upon request (in case of a new open position, the Data Controller compares the data with the professional requirements of the new position and in case of a positive result, contacts the data subject). - The special requirements for the application into trainee programme are described on the webpage.

(ii) Application into the database of the Data Controller

- The applicant (data subject) may also apply to the database of the Data Controller in the lack of an actual open position by sending his / her application (resume) electronically. In this case the Data Controller shall always receive the consent of the applicant (data subject) for the data control.
- In case of a new open position, the Data Controller compares the data with the professional requirements of the new position and in case of a positive result, contacts the data subject.

6.2 Sending newsletters

Who is the data subject?	Data subject is the natural person who subscribes to the newsletter service by giving his /her personal data.
What is the purpose of data controlling?	The purpose of data controlling is sending email newsletters containing also commercial advertisements, informing the data subject about news and the services of the Data Controller.

Scope of processed data and purpose of data controlling	
name (mandatory given by the data subject)	identification
email address (mandatory given by the data subject)	sending newsletter
CRM identification number	registration
fact and date of subscription	recording the consent
analytical data (date and time of activity) in connection with sending, delivering and opening the messages	preparing statistics

What is the source of the data?	The data subject himself / herself submits the data by subscribing to the newsletter / opening the newsletter.
What is the method of data controlling?	Data controlling takes place in electronic form (saving to server, recording in CRM or other electronic software).

Who is entitled to process the data?	The data may be known and be processed by the Data Controller and those employees / assignees of the data processors whose scope of job / whose task includes the fulfilment of the data controlling purpose(s).
Which is the legal basis of data controlling (lawfulness of processing)?	The legal basis of data controlling is the freely given consent of the applicant (data subject) [GDPR Article 6. Section (1) Point a)].
What is the period of data controlling?	Until erasure upon request.
Can the data subject withdraw its consent to data controlling?	The Data Controller informs the applicant (data subject) that he / she can withdraw his / her consent to data controlling anytime (please see the description of the process). The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
Description of the process	*(i) Subscription to newsletters* The data subject may subscribe to newsletters by giving the above listed data, as follows: a) electronically on the https://wtsklient.hu/hirlevel-feliratkozas/ webpage; b) by giving a consent in a paper form (adoption into the manual database). *(ii) Unsubscribe from newsletters (withdrawal of the consent)* The data subject may unsubscribe from the newsletter any time as follows: a) by clicking to unsubscribe link, which can be found on the bottom of each newsletter; b) via email, by sending a request to unsubscribe to info@wtsklient.hu email address; c) via post by sending a request to unsubscribe to the following address: 1143 Budapest Stefánia út 101-103. *(iii) Review of the newsletter subscription list:* The Data Controller reviews the newsletter subscription list every 4 year and requests for the confirmation of consent for sending newsletters, furthermore, the Data Controller requests the data subject to control the accuracy if his /her data and to correct those if necessary. With respect of those data subjects who

do not give a confirmation for sending newsletters within 30 days after receiving the email, the Data Controller deletes their data from the database on the 31st day.

(iv) Statistics

The Data Controller monitors the reading of newsletters. For that effect, based on the clicks to the links in the newsletters, it monitors and records if the data subject has opened the email or deleted it without opening it, and also the number of clicks to the links.

6.3 Other data controlling of direct marketing purposes

Who is the data subject?	The data subject is the natural person who provides his / her personal data in order that the Data Controller saves those in its database and processes the personal data for contact and direct marketing purposes other than sending newsletters as described in Section 6.2 of this Privacy Policy.
What is the purpose of data controlling?	The purpose of data controlling is sending letters (for example information about actual events, sending invitations) including direct marketing tools and commercial advertisements other than sending newsletters as described in Section 6.2 of this Privacy Policy, follow-up of reactions to such messages, personalisation of email messages by using other information (company name) given by the subscribed users, keeping contact.

Scope of processed data and purpose of data controlling	name (mandatory given by the data subject)	identification
	email address (mandatory given by the data subject)	contacting for direct marketing purposes
	telephone number	contacting for direct marketing purposes
	company name	contacting for direct marketing purposes, market research, offering services, personalising of direct marketing tools
	registered seat of the company	contacting for direct marketing purposes
	position/division	contacting for direct marketing purposes

	fact of the consent to being contacted for direct marketing purposes	recording the consent
	date of giving consent to direct marketing communication	recording the consent
	analytical data in connection with the sending and delivery of messages (for example date and time of activity, identity)	creating statistics

What is the source of the data?	The data subject himself / herself submits the data.
What is the method of data controlling?	Data controlling takes place in electronic form (saving to server, recording in CRM or other electronic software).
Who is entitled to process the data?	The data may be known and be processed by the Data Controller and those employees / assignees of the data processors whose scope of job / whose task includes the fulfilment of the data controlling purpose(s).
Which is the legal basis of data controlling (lawfulness of processing)?	The legal basis of data controlling is the freely given consent of the data subject [GDPR Article 6. Section (1) Point a)].
What is the duration of data controlling?	Until erasure upon request.
Can the data subject withdraw its consent to data controlling?	The Data Controller informs the data subject that he / she can withdraw his / her consent to data controlling anytime (please see the description of the process). The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Description of the process	*(i) Consent to data controlling for direct marketing purposes* The data subject may subscribe to data controlling for direct marketing purposes by giving the above listed data as follows: a) electronically on the https://wtsklient.hu/hirlevel-feliratkozas/ webpage; b) by giving a consent in a paper form (adoption into the manual database). *(ii) Withdrawal of the consent concerning data controlling for direct marketing purposes* The data subject may withdraw his / her consent for data controlling for direct marketing purposes anytime, as follows: a) by clicking to unsubscribe link, which can be found on the bottom of the emails; b) via email, by sending a request to info@wtsklient.hu email address; c) via post by sending a request to the following address: 1143 Budapest Stefánia út 101-103. *(iii) Review of the newsletter list:* The Data Controller reviews its database every 4 year and requests for the confirmation of the consent to the data controlling of direct marketing purposes, furthermore the Data Controller requests the data subject to control the accuracy of his /her data and to correct those if necessary. With respect of those data subjects who do not give a confirmation of the consent for data controlling for direct marketing purposes within 30 days after receiving the email, the Data Controller deletes them from the database on the 31st day. *(iv) Statistics* The Data Controller monitors the reading of newsletters. For that effect, based on the clicks to the links in the newsletters, it monitors and records if the data subject has opened the email or deleted it without opening it, and also the number of clicks to the links.

6.4 Request for information/giving information, request for proposal giving proposal

Who is the data subject?	Data subject is the private individual, who contact the Data Controller via phone/email/post/Webpage or in person in order to ask for information or proposal in relation to the services offered by the data controller by giving his or her personal data.
What is the purpose of data controlling?	The purpose of data controlling is the giving information/proposal, contact, preparatory steps for contracts, contract preparation. If the data subject does not accept the proposal, the further purpose of the data controlling is direct marketing.
Scope of processed data and purpose of data controlling	

name	identification
email address (optional)	contact
telephone number (optional)	contact
company name	identification, contact, giving information/proposal
city/town country	giving information/proposal
level of contact	identification/contact
content of the requested information/proposal	giving information/proposal
date of the requested information/proposal	giving information/proposal
content of the information/proposal	giving information/proposal

What is the source of data?	The data subject himself / herself submits the data.
What is the method of data controlling?	Data controlling takes place in a paper-based form (archiving) and in electronic form (saving to server, recording in CRM or other electronic software).

Who is entitled to process the data?	The data may be known and be processed by the Data Controller and those employees / assignees of the data processors whose scope of job / whose task includes the fulfilment of the data controlling purpose(s). The data are controlled in electronic and printed form.
Which is the legal basis of data controlling (lawfulness of processing)?	Legitimate interest of the Data Controller [GDPR Article 6. Section (1) Point b)] - giving information/proposal, to ensure communication with the data subject for the purpose of contract preparation
What is the duration of data controlling?	The Data Controller controls the data: (i) but for 2 years as of the response, the most; (ii) in case of request or provision of a proposal, if the proposal is accepted, until the statute of limitation of the assertability of the rights and obligations arising from such legal relationship; (iii) in case of request or provision of a proposal, if the proposal is not accepted, for 2 years as of the provision of proposal, the most, unless the data subject indicates in advance that the Data Controller no longer processes the data for direct marketing purposes.
Joint Data Controlling	The Data Controller and HLB Magyarország Könyvvizsgáló és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Stefánia út 101-103.; company registration no.: Cg.01-09-683898) define jointly the purposes and means of processing the contact data (name, position, email address; phone number, company name). Therefore, they are deemed as joint data controllers, having joint and several liability.
Description of the process	- The data subject contacts the Data Controller upon his / her choice personally / on the phone / via email / via post/ on the webpage by giving his / her personal data (name and contact details up to his / her choice) in order to request an information / offer for the services offered by the Data Controller. - The Data Controller gives an information / offer to the data subject on his / her contact details by telephone number / email address / address based on his / her choice.

6.5 Presence on social media platform (Facebook, LinkedIn, XING, YouTube, Instagram)

Who is the data subject?	Data subject is a private individual who uses the media platforms, follows, shares or likes the contents of the Data Controller or who contacts the Data Controller through it, or uses the media platform for any other allowed activities.	
What is the purpose of data controlling?	The purpose of data controlling is to share the information found on the Webpage on social media platforms. The Data Controller only gets in touch with the data subjects through the media platforms, and the circle of the controlled data becomes important if the data subject contacts the Data Controller through the social media platforms.	
Scope of processed data and purpose of data controlling	public name	identification
	public photo (not stored by the Data Controller)	identification
	message and response through social media platform	response
	rating	quality improvement
What is the source of data?	The data subject submits himself / herself the data.	
What is the method of data controlling?	The data are controlled in electronic form.	
Who is entitled to process the data?	The data may be known and be processed by the Data Controller and those employees/assignees of the data processors whose scope of job / whose tasks includes the fulfilment of the data controlling purposes. The data is controlled in an electronic way.	
Which is the legal basis of data controlling (lawfulness of processing)?	The legal basis of data controlling is the freely given consent of the data subject [GDPR Article 6. Section (1) Point a)].	

What is the duration of data controlling?	Until the response or prior to that until erasure upon request. In case the data subject asks for information or proposal, the data controlling process is written in a detailed version in the 6.4 section of the Privacy Policy.
Can the data subject withdraw his / her consent to data controlling?	The Data Controller informs the data subject that he / she can withdraw his / her consent to data controlling anytime (please see description of the process). The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
Description of the process	- The Data Controller is available on social media platforms Facebook/LinkedIn/XING/YouTube/Instagram, on these platforms the Data Controller shares news, events, videos and the contents which can be found on the webpage. - The data subject gives its consent to share the news, events, videos of the Data Controller on his /her message board by clicking into “like” or „share” links. - The data subject may be informed about the data controlling of Facebook/LinkedIn/XING/YouTube/Instagram on their webpage.
Built in modules	Facebook plugin The Facebook services are provided by Meta Platforms Ireland Ltd. (4 Grand Canal Square Grand Canal Harbour, Dublin 2) on the following address: https://www.facebook.com/. The description of the Facebook built-in module can be found on the following link: https://developers.facebook.com/docs/plugins/page-plugin The Facebook Privacy Policy can be found on the following link: https://www.facebook.com/privacy/policy/ LinkedIn plugin A LinkedIn services are provided by the LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2) The description of the LinkedIn built-in module can be found on the following link: https://legal.linkedin.com/plugin-terms-of-use The LinkedIn Privacy Policy can be found on the following link: https://www.linkedin.com/legal/privacy-policy XING plugin The XING services are provided by 20354New Work SE (Am Strandkai 1, 20457 Hamburg) on the following address: https://www.xing.com/. The description of XING built-in module can be found on the following link: https://dev.xing.com/plugins/terms_and_conditions. The XING Privacy Policy can be found on the following link: https://privacy.xing.com/en/privacy-policy

YouTube plugin
The YouTube services are provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) on the following address: https://www.youtube.com/ The description of YouTube built-in module and the YouTube Privacy Policy can be found on the following link: https://policies.google.com/privacy

Instagram plugin
The Instagram services are provided by Meta Platforms Ireland Ltd. (4 Grand Canal Square Grand Canal Harbour, Dublin 2) on the following address: https://www.instagram.com/ The description of Instagram built-in module can be found on the following link: https://developers.facebook.com/docs/plugins/page-plugin The Instagram Privacy Policy can be found on the following link: https://privacycenter.instagram.com/policy/

6.6 Further data controlling

Concerning the data controlling activities not presented in this Privacy Policy, the Data Controller informs the data subjects upon recording the data.

7. Data transfers

Personal data are basically processed by the Data Controller, or, in case of outsourcing such activity, it is carried out by data processors listed under Annex 1 to this Privacy Policy. In that case the Data Controller provides data to the Data Processors and the Data Controller is liable for his / her / their activities. The Data Controller may forward personal data in case of a request by an authority based on provisions of law.

8. Cookie policy of the https://wtsklient.hu webpage

By clicking on the „Agree" button, the data subject (user) agrees that cookies will be used by the Webpage. [Section 6 (1) a) of the GDPR]. The data subject can withdraw his or her consent anytime.

(i) What does the expression „cookies" mean?

The cookies are pack of information placed in the browser of the suitable devices by the server of the Data Controller or by the service provider of the Data Controller. When the data subject (user) visits the concerned webpage again, the browser visualize the webpage according to the cookies.

(ii) What purposes can the cookies be used by the Data controller for?

The Data Controller uses cookies in order to optimize the structure and content of the website for visitors. Cookies used by the Data Controller:

- performance-enhancing cookies: the purpose of these cookies is to make the structure of the website as practical as possible for visitors and
- cookies for statistical purposes: these cookies are Google Analytics' own cookies, thanks to which the Data Controller receives anonymous statistics about the activity of visitors on the site. In connection with these cookies, users get a unique ID which cannot be linked to a person by us and cannot be used to identify the visitor for us.

The cookies used on the site are not suitable for collecting personal data of visitors and the applied cookies are not suitable for identifying the visitors. The Data Controller does not store any personal data of visitors and does not conduct any remarketing research to survey their habits. The Data Controller does not apply own cookies suitable for obtaining personal data.

(iii) How can the cookies be regulated?

The data subject (user) can manage the settings of the cookies in the browser, in the frame of which the data subject can limit or deny the use of cookies. Concerning the deletion or prohibition of the cookies, the use of „help" menu of the respective browser can provide further information.

Google Chrome	https://support.google.com/chrome/answer/95647?hl=hu
Firefox	https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito
Safari	https://support.apple.com/hu-hu/guide/safari/sfri11471/mac
Explorer	https://support.microsoft.com/hu-hu/help/278835/how-to-delete-cookie-files-in-internet-explorer

(iv) The cookies named by the webpage

Name of cookie	Domain	Function	Validity
_gat_gtag_UA_91928828_1	wtsklient.hu	It serves for providing data for Google Analytics' statistical system for the anonymous measurement of the number of visitors	end of session
_gat	wtsklient.hu	It serves for providing data for Google Analytics' statistical system for the anonymous measurement of the number of visitors	end of session
_ga	wtsklient.hu	It serves for providing data for Google Analytics' statistical system for the anonymous measurement of the number of visitors	2 years
_gid	wtsklient.hu	It serves for providing data for Google Analytics' statistical system for the anonymous measurement of the number of visitors	1 day
wpml_current_language	wtsklient.hu	It serves for preserving the selected language when navigating within the page.	end of session
displayCookieConsent	wtsklient.hu	It serves for storing the user's decision on accepting the pop-up window regarding the management of	12 months

		cookies, in a number format.	

The server of the Data Controller or the service provider engaged by the Data Controller is using Google Analytics, which might place cookies in the browser of suitable devices. By using the Google Analytics for statistical purposes, the Data Controller collects data concerning the visiting of the webpage. The Google Analytics records data like the length of time spent on the Webpage by the data subject (user), or the way the data subject (user) reached the Webpage. The IP address and the type of the browser also belongs to the group of the collected data. Data which leads to the identification of the data subject are not collected.

The provider for users in the European Economic Area or in Switzerland is Google Ireland Limited (registered seat: Gordon House, Barrow Street, Dublin 4, Ireland), for useres in the United Kingdom is Google LLC (registered seat: 1600 Amphitheatre Parkway, Mountain View, California 94043, USA). The privacy policy of the Google Analytics can be found on the following link: https://support.google.com/analytics/answer/6004245?hl=hu

The data subject (user) can install an add-on module in his or her browser, which denies access of Google Analytics concerning the data subject's (user's) data. For this operation the following link can be used: tools.google.com/dlpage/gaoptout

9. Data security

The Data Controller ensures the security of the data; therefore, the Data Controller implements appropriate technical and organisational measures (for example: pseudonymisation and encryption; assurance of the ongoing confidentiality, integrity, availability and resilience of processing systems and service measures; testing, assessment and evaluation of the processing system) in order to ensure a level of security appropriate to the risk. Furthermore, the Data Controller intends to take into consideration the actual state of technical development when defining and implementing the technical and organisational measures. The Data Controller guarantees the fulfilment of data security by internal policies, orders and procedures.

With respect to security of information technology, the Data Controller ensures especially:

- measures against the unauthorized access to personal data, including the physical and logical protection of the software and hardware tools and devices;
- measures for possibility of recovering the data, including regular backups and separate handling of backups;
- anti-virus protection of the data.

The Data Controller is certified by ISO 27001 (standard for Information Security Management System).

This Privacy Policy has been prepared in Hungarian and in English languages. In case of any discrepancies between the Hungarian and the English text, the Hungarian version shall prevail.

10. Annex 1. – Data Processors

(i) *Soulware Zártkörűen Működő Részvénytársaság (registered seat: 1031 Budapest, Záhony utca 7.; company registration number: Cg.01-10-046527)*
provision of technical background in connections with newsletters and direct marketing database

(ii) *Flamich Gábor private entrepreneur (registered seat: 1213 Budapest, Kapos utca 21., 4th floor, door No. 17; registration number: 35560283)*
provision of the technical background in connection with the https://wtsklient.hu/ webpage, development

(iii) *ALT Kereskedelmi Korlátolt Felelősségű Társaság (registered seat: 1047 Budapest, Fóti út 56.; registration number: Cg.01-09-072469)*
system administration activity

(iv) *Closte, LLC (1603 Capitol Ave. Suite 310 A546 Cheyenne, Wyoming 82001)*
providing web hosting services for the webpage

(v) *Zoho Corporation B.V. (registered seat: Beneluxlaan 4B, 3527 HT UTRECHT, The Netherlands)*
receipt of application materials, organising of the database, the processed data are physically stored by Zoho Corporation GmbH