# Privacy Notice

The purpose of this Privacy Notice is to provide visitors of the www.paradox.hu website with detailed information on the personal data processed in connection with the use of the website, contacting us, subscribing to the newsletter, and other data processing operations related to the operation of the website.

The installer profiles available on the website are publicly accessible so that interested parties can get to know the Partners who have experience in installing Paradox systems. The data contained in the profiles are publicly displayed on the basis of the Partners' consent.

In the course of using the website, personal data may be processed in certain cases, in particular in connection with contacting us, subscribing to the newsletter or the technical operation of the website.

In the course of data processing, Power Biztonságtechnikai Kft., as Data Controller, acts in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and the applicable Hungarian data protection legislation.

Should you have any questions regarding this Notice, please contact us at the e-mail address adatkezeles@powerbizt.hu, and our colleague will be happy to respond.

**Your data are processed, as Data Controller, by**
**Power Biztonságtechnikai Kereskedelmi Kft.**
company registration number: 01-09-974579
tax number: 13678144-2-41
registered office: 1031 Budapest, Kazal utca 64-66.
e-mail address: info@powerbizt.hu
representative: Miklós Banai

Some of our services are provided with the involvement of others, who may necessarily also have access to your data. These data processors are indicated for each data processing operation.

Power Biztonságtechnikai Kft. (hereinafter: the Company) aims to ensure that we act in accordance with the regulations in the course of our data processing and that all of our clients can confidently entrust their data to our Company. To this end, in accordance with the requirements of the Hungarian data protection authority (NAIH), it processes personal data respecting, and in accordance with, the principles applicable to the processing of personal data, namely:

- fairly and in a manner transparent to the Data Subject;
- using personal data collected for specified, explicit and lawful purposes;
- by processing data that are adequate, relevant and necessary for the purposes of the processing (in accordance with the principle of data minimisation);
- accurately and in an up-to-date manner (in accordance with the principle of accuracy);
- in accordance with the principle of storage limitation;
- by applying technical and organisational measures that ensure appropriate security of the personal data against unauthorised or unlawful processing, accidental loss, destruction or damage (based on the principles of integrity and confidentiality);
- in compliance with the principles of data protection by design and by default and of accountability.

***Contacting us via the website***

On the public interface of the website, it is possible to send a message to the Data Controller by completing the contact form.

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| Scope and categories of data processed | – name, e-mail address, telephone number, content of the message |
| Purpose of data processing | handling enquiries, making contact, responding |
| Duration of data processing | The Data Controller retains the data provided during contact for a maximum of 5 years following the closure of the enquiry, unless a different retention obligation is prescribed by law or the data subject requests erasure earlier. |
| Legal basis of data processing | Article 6(1)(a) GDPR – consent of the data subject |
| Source of data | The data originate directly from the data subject. |
| Data processor | **nGroup Kft.** 1134 Budapest, Lehel u. 9/A, II. em. 3. ajtó, Company registration number: 01-09-999285, Website: www.netpeople.hu – Activity: website development and operation, hosting services, system maintenance |

Completion of the fields marked with an asterisk (*) is mandatory, as without them the Data Controller is unable to process the enquiry or provide a substantive response to it.

The Data Controller does not transfer the data to third parties, except where required by law.

***Newsletter subscription***

The website offers the possibility to subscribe to the newsletter.

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| Scope and categories of data processed | – e-mail address<br>– time of subscription<br>– time of confirmation of subscription<br>– technical data necessary to verify consent |
| Purpose of data processing | Sending newsletters to the data subject by electronic means, in the framework of which the Data Controller provides information on:<br>- news and updates related to the Paradox brand,<br>- product presentations and descriptions,<br>- information to help with selecting the appropriate installer,<br>- periodic campaigns and promotions,<br>- educational and marketing content related to security technology solutions.<br><br>A further purpose of the data processing is to carry out marketing communication in connection with the Paradox brand. |
| Duration of data processing | The Data Controller processes the data of the data subject who has subscribed to the newsletter until consent is withdrawn.<br>The data subject may withdraw their consent at any time, without giving reasons, by clicking on the unsubscribe link at the bottom of the newsletter. The withdrawal of consent shall not affect the lawfulness of processing carried out prior to the withdrawal. |
| Legal basis of data processing | The legal basis of the data processing is Article 6(1)(a) GDPR, i.e. the freely given, specific and informed consent of the data subject. |
| Source of data | The data originate directly from the data subject. |

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| Data processor | For sending newsletters, the Data Controller uses the services of ActiveCampaign, which acts as a data processor.<br>ActiveCampaign may access the processed data to the extent necessary to provide the service.<br>**ActiveCampaign** 1 North Dearborn St 5th Floor Chicago, IL 60602 Activity: newsletter software<br>**nGroup Kft.** 1134 Budapest, Lehel u. 9/A, II. em. 3. ajtó, Company registration number: 01-09-999285, Website: www.netpeople.hu – Activity: website development and operation, hosting services, system maintenance |

Double opt-in system

Subscription to the newsletter operates in a confirmation-based (double opt-in) system. Following subscription, the data subject receives a confirmation e-mail, and the subscription to the newsletter becomes final only after the confirmation link has been clicked.

This ensures that only the legitimate user of the given e-mail address can subscribe to the newsletter.

**What rights you have and what legal remedies are available to you**

Right to information, inspection and access:
The data subject concerned by the data processing must be informed, prior to the collection of the data, whether the provision of data is voluntary or mandatory. In the case of mandatory provision of data, the legislation ordering the data processing must also be indicated.

If the data subject so requests, the personal data processed by the Company – i.e. the data controller – shall be made available to them. The Company provides concise, clear and easily understandable information on the processing of the personal data in its possession. The Company is obliged to provide the information in writing, in an easily understandable form, within 30 days of the submission of the request.

The privacy notice contains the name and contact details of the data controller; the purpose of the data processing and the legal basis of the data processing, as well as, where applicable, the recipients or categories of recipients of the personal data.
In addition, at the time when the personal data are obtained, the Company provides the data subject with the following additional information:

- the period for which the personal data will be stored;
- the data subject's right to request access to, rectification, erasure or restriction of processing of personal data concerning them, and to object to the processing of such personal data, as well as the data subject's right to data portability;
- in the case of processing based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to lodge a complaint with a supervisory authority;
- whether the provision of personal data is a statutory or contractual requirement or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data, and what the possible consequences of failure to provide such data may be.

If the Company intends to further process the personal data for a purpose other than that for which they were collected, it must provide the data subject, prior to such further processing, with information on that other purpose and with all relevant additional information referred to above.

Right to restriction of processing:

The data subject has the right to obtain from the Company, at their request, restriction of processing where one of the following conditions applies:

- the accuracy of the personal data is contested by the data subject, in which case the restriction applies for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing; in this case the restriction applies pending verification of whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed 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 or for reasons of important public interest of the Union or of a Member State. The Company informs the data subject (at whose request the processing was restricted) in advance of the lifting of the restriction.

Right to rectification:
The data subject has the right to obtain from the controller, at their request and without undue delay, the rectification of inaccurate personal data concerning them, and to request that incomplete personal data be completed.

Right to erasure ('right to be forgotten'):
The data subject has the right to obtain, at their request, the erasure of personal data concerning them without undue delay, and the Company is obliged to erase personal data concerning the data subject without undue delay where one of the following grounds applies:
- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

Right to data portability:
The data subject has the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Right to object:
The data subject has the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data where the legal basis of the processing is the legitimate interest of the controller. In this case, the Company may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or which relate to the establishment, exercise or defence of legal claims.
The managing director of the Company – while simultaneously suspending the data processing – is obliged to examine the objection within the shortest possible time from the submission of the request, but within no more than 15 days, and to inform the applicant in writing of the outcome. If the objection is justified, the data controller is obliged to terminate the data processing – including further data collection and data transfer – and to block the data, and to notify all those to whom the personal data affected by the objection were previously transferred, and who are obliged to take action to enforce the right to object, of the objection and of the measures taken on the basis thereof. If the data subject does not agree with the decision taken, they may challenge it before a court within 30 days of its communication, in accordance with the data protection act.

**Legal remedies:**

Right to lodge a complaint with the Authority
Without prejudice to any other administrative or judicial remedy, every data subject has the right to request the initiation of a data protection authority procedure with the data protection authority, i.e. the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: the Authority), if the data subject considers that the processing of personal data relating to them infringes EU or national legislation. The Authority to which the request has been submitted is obliged to inform the client of the procedural developments related to the complaint and of its outcome, including the fact that the client is entitled to seek a judicial remedy.
If the data subject considers that the Company, or the data processor engaged by it, has, through its activity or omission, committed an infringement or caused an imminent risk thereof, they may initiate an investigation with the Hungarian National Authority for Data Protection and Freedom of Information in order to have their case examined. The Authority's investigation is free of charge.

Right to an effective judicial remedy against the Authority:
Without prejudice to any other administrative or non-judicial remedy, each natural or legal person has the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning them, or where the Authority does not handle the complaint or does not inform the data subject within three months of the procedural developments or the outcome of the complaint lodged by them.

Right to an effective judicial remedy against the data controller or data processor:
The data subject may bring proceedings before a court against the data controller or the data processor if they consider that the data controller, or the data processor engaged by it or acting on its instructions, processes their personal data in breach of the requirements laid down in legislation or in a binding legal act of the European Union on the processing of personal data.

Right to compensation:
Any person who has suffered material or non-material damage as a result of an infringement of the GDPR or of national data protection legislation shall be entitled to compensation from the data controller or the data processor for the damage suffered.

If the data controller or its data processor infringes the requirements laid down in legislation or in a binding legal act of the European Union on the processing of personal data and thereby violates the personality rights of another person, the person whose personality rights have been violated may claim restitution from the data controller or the data processor.

The data controller and the data processor, as well as joint controllers and the data processors engaged by them or acting on their instructions, shall, for damage caused by an infringement of the requirements laid down in legislation or in a binding legal act of the European Union on the processing of personal data,
a) be jointly and severally liable to the data subject for the damage, and
b) be jointly and severally obliged to pay the data subject the restitution due in the event of a violation of personality rights.
No compensation shall be payable and no restitution may be claimed to the extent that the damage or the infringement resulting from the violation of personality rights was caused by the intentional or grossly negligent conduct of the injured party or of the person whose personality rights were violated.

Complaints may be lodged with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).
Contact details of NAIH:
Name: Hungarian National Authority for Data Protection and Freedom of Information
Registered office: 1055 Budapest, Falk Miksa utca 9-11
Postal address: 1363 Budapest, P.O. Box 9.

Website: http://www.naih.hu
Telephone: 06-1/391-1400
Fax: 06-1/391-1410
E-mail: ugyfelszolgalat@naih.hu

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