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PRIVACY STATEMENT

ON THE DATA MANAGEMENT RELATED TO WEBSITE

Special Effects Zrt. (1155 Budapest, Wysocki street 1., company registration number: 01-10-046812, email: info@speceffect.com), (hereinafter: the **Company**) informs the natural persons who visit the website www.speceffect.com (hereinafter: the **Website**) that it manages their personal data in connection with the use of the Website, as follows:

1. INTERPRETATIVE PROVISIONS

1.1. Data processor:

any natural or legal person who processes personal data on behalf of the controller.

1.2. Data management:

any operation performed on personal data or data set in an automated or non-automated manner, such as collecting, recording, organizing, storing, altering, querying, using, transmitting, restricting or even deleting.

1.3. Data controller:

any natural or legal person who independently or jointly with others determines the purposes and means of personal data management.

1.4. Recipient:

any natural or legal person, public authority, agency or any other body to whom personal data are disclosed, regardless of whether it is a third party. Public authorities that may have access to personal data in the framework of an individual investigation in accordance with Union or Member State law shall not be considered as recipients. The management of the mentioned data by these public authorities shall comply with the applicable data protection rules in accordance with the purposes of data management.

1.5. Consent of the data subject

a voluntary, specific and explicit expression of the will of the data subject based on adequate information, by which the data subject indicates, by means of a statement or an act which unequivocally expresses the confirmation, that the data subject consents to the management of the personal data concerning him/her.

1.6. Personal data:

any information relating to an identified or identifiable natural person ("data subject"). A natural person can be identified who can be identified, directly or indirectly, such as by name, number, location data, online identifier or one or more factors related to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.



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2. DATA MANAGEMENT

A. Data management related to claims submitted via the website

- Legal basis:** (i) the data subject's consent, which the data subject provides by submitting a claim via the Company's Website.
(ii) Section 13/A of the Act on Electronic Commerce and on Information Society and Section 169 (2) of the Act on Accounting.
- Purpose:** Submission of claims by customers via the Website for a specific event, preparation of offers on the basis of claims, documentation of claims and related invoices, fulfilment of accounting obligations, contact with customers.
- Data concerned:** name, email, phone number
- Persons concerned:** any natural person who submits a claim via the Website as described above
- Duration:** (i) no more than 30 days after the relevant event with regard to the data provided on the Website for the submission of the claim.
(ii) Pursuant to Section 169 (2) of the Act on Accounting, it is 8 years with regard to the data of invoices based on the submission of claims.
- Recipient:** employees of the Company dealing with customer relations and orders, data processors, senior officer

B. Data management related to references and recommendations

- Legal basis:** consent of the data subject
- Purpose:** presentation of the Company's references, publication of recommendations related to the services provided by the Company via the Website
- Data concerned:** name, company name
- Persons concerned:** any natural person who voluntarily makes a recommendation about the Company in respect of which he/she consents to its appearance on the Website.
- Duration:** until the consent is revoked (or in the absence thereof, for a maximum of 5 years)
- Recipient:** employees of the Company dealing with customer relations, orders, marketing, advertising, data processors, senior officer



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C. Data management related to registration on the meetsafe.speceffect.com website

Legal basis:	The data subject's consent, provided on the Company's mentioned website upon registration by the data subject.
Purpose:	Providing access to content, sending the password required to log in, contact.
Data concerned:	name, company name, email
Persons concerned:	any natural person who registers on the mentioned website
Duration:	5 years since the last login
Recipient:	employees of the Company dealing with the operation of the mentioned website, data processors, senior officer

3. RIGHTS OF THE DATA SUBJECTS

The data subject may request information on the management of his/her personal data, as well as request their rectification, or deletion and revocation, with the exception of mandatory data management, may exercise the right to carry data and to object, in the manner indicated at the time of recording the data and at the contact details of the Company.

Right to information:

The Company shall take appropriate measures to ensure that all information concerning the personal data management referred to in Articles 13 and 14 of the GDPR is provided to the data subjects and to provide all information in accordance with Articles 15 to 22 and 34 in a concise, transparent, understandable and easily accessible form and in a clear and comprehensible manner.

The right to information may be exercised in writing through the contact details of the Company contained in this Statement. Upon request, information may be provided orally to the data subject upon verification of his/her identity.

The data subject's right of access:

The data subject has the right to receive feedback from the Company as to whether the management of his/her personal data is in progress and, if such data management is in progress, the data subject has the right to access the personal data and the following information:

- the purposes of data management;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the planned duration for which the personal data will be stored;



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- the right to rectification, deletion or restriction of data management and the right to object;
- the right to file a complaint with the supervisory authority;
- the information on data sources;
- the fact of automated decision making, including profiling.

The Company shall provide the information within a maximum of one month from the submission of the request.

Right to rectification:

The data subject may request the rectification of the inaccurate personal data managed by the Company concerning him/her and the completion of incomplete data.

Right to deletion:

The data subject is entitled, if any of the following reasons exists, that the Company deletes personal data concerning him/her without undue delay, upon request:

- the personal data are no longer required for the purpose for which they were collected or otherwise managed;
- the data subject revokes his/her consent on which the management is based and there is no other legal basis for the management;
- the data subject objects to the management and there is no overriding legitimate reason for the management;
- the personal data have been managed unlawfully;
- the personal data shall be deleted in order to fulfil a legal obligation under Union or Member State law applicable to the Company;
- the personal data were collected in connection with the provision of information society services.

Deletion of data cannot be initiated, if data management is required:

- for the purpose of exercising the right to freedom of expression and information;
- to fulfil an obligation under Union or Member State law applicable to the Company requiring personal data management, or to carry out a task performed in the public interest or in the framework of the exercise of a public authority vested in the Company;
- concerning the field of public health or for archival, scientific and historical research or statistical purposes based on public interest; or
- to file, enforce or defend legal claims.

Right to restrict data management:

At the request of the data subject, the Company shall restrict data management if one of the following conditions is met:

- the data subject disputes the accuracy of the personal data, in which case the restriction shall apply for a period which allows the accuracy of the personal data to be verified;



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- the data management is unlawful and the data subject objects the deletion of the data and instead requests that their use be restricted;
- the Company no longer needs the personal data for the purpose of data management, but the data subject requires them to submit, enforce or defend legal claims; or
- the data subject objects data management, in which case, the restriction shall apply for the period during which it is determined whether the legitimate reasons of the Company prevail over the legitimate reasons of the data subject.

If data management is restricted, personal data may be managed, with the exception of storage, only with the consent of the data subject or for the purpose of submitting, enforcing or defending legal claims or protecting the rights of another natural or legal person, or in the overriding public interest of the Union or a Member State.

The Company shall inform the data subject of the lifting of the restriction on data management.

Right to carry data:

The data subject has the right to receive the personal data concerning him/her, provided to the Company, in a structured, widely used, machine-readable form and to transmit this data to another data controller.

Right to object:

The data subject has the right to object at any time, for reasons related to his/her situation, against the management of his/her personal data necessary for the performance of a task in the public interest or in the framework of the exercise of a public authority vested in the Company, or against any management necessary to enforce the legitimate interests of the Company or a third party, including profiling based on the mentioned provisions. In the event of an objection, the Company may not further manage the personal data, unless it is justified by compelling legitimate reasons which prevail over the interests, rights and freedoms of the data subject or which relate to the submission, enforcement or defence of legal claims.

If the personal data are managed for the purpose of direct business acquisition, the data subject has the right to object at any time against the management of personal data concerning him/her for that purpose, including profiling, in so far as it relates to direct business acquisition. In the event of an objection against personal data management for the purpose of direct business acquisition, the data may not be managed for this purpose.

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 management, including profiling, which would have legal effects on him/her or would significantly affect him/her.



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The above entitlement shall not apply if data management:

- is necessary for the conclusion or performance of a contract between the data subject and the Company;
- it is permitted by Union or Member State law applicable to the Company, which also determines appropriate measures to protect the rights, freedoms and legitimate interests of the data subject; or
- is based on the express consent of the data subject.

Right to revocation:

The data subject has the right to revoke his/her consent at any time. The revocation of consent shall not affect the legality of data management prior to revocation.

Right to legal remedy:

Right to refer to the court:

If the data subject's rights are violated, he/she can refer to the court. The court shall act out of turn in the case.

Data protection authority procedure:

Complaints may be filed with the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Hungarian National Authority for Data Protection and Freedom of Information

Registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Pf.: 5.

Telephone: +36 1 391 1400

Fax: +36 1 391 1410

Email: ugyfelszolgalat@naih.hu

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

The full Privacy Statement of the Company can be requested at the following email address:
info@speceffect.com