

HAFNER Pneumatika Kft.

H-9228 Halászi, Püski Street 3.

Phone: +36-96-210-601 | Fax: +36-96-210-615

E-mail: ertekesites@hafner-pneumatika.com

Web: www.hafner-pneumatika.com



DATA MANAGEMENT INFORMATION

SHORT SUMMARY

- We collect and manage personal data only according to related laws.
- We send DM letters only in case of having a particular approval. However, we might send a system message even without approval.
- We store data as securely as possible.
- We transfer data to a third party only with permission.
- We inform anyone regarding the data stored about him, in case of asking for it in writing on the following e-mail address: ertekesites@hafner-pneumatika.com
- The deletion of personal data can be requested on the following email address: ertekesites@hafner-pneumatika.com

INTRODUCTION

HAFNER Pneumatika Producer, Distributor and Service Public Limited Company (H-9228 Halászi, Püski Street 3., Registration number: 08-09-002042, VAT number: 10579785-2-08) (hereinafter: Provider, Data Manager) submits itself to the following information.

Registration number of data management is: NAIH-77170/2014.

The 20th § (1) chapter of the CXII. Law of 2011 about information autonomy and freedom of information states that the concerned person (in this case, the user of the online catalogue and client website, hereinafter: User) has to be informed before the beginning of data management, if it is based on permission or it is mandatory.

Before the beginning of data management, the concerned person (hereinafter: stakeholder) has to be informed clearly and in detail about all the facts regarding the handling procedures of his data, thus, especially about the aim and the claim of data management, about the person entitled to process and manage his data, and about the duration of data management.

Based on the 6th § (1) of the Information Law, the stakeholder has also to be informed, that personal data is also allowed to be managed, in case it is impossible or it would cause unreasonable expenses to get the approval of the concerned person, and the management of personal data

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- is necessary because of the legal obligation of the data manager or
- it is necessary in order to ensure the legitimate interest of the data manager or a third party, and the ensuring of this interest is proportional to the limitation of the law concerning protection of personal data.

The information has to include the rights of the stakeholder regarding data management, and also his possibilities for legal remedy.

In case it is impossible to inform stakeholders personally or it would cause unreasonable expenses (for example, in this case, in an online catalogue), the information can be implemented by announcing the following information officially:

- a) the fact of data collecting
- b) stakeholders
- c) aim of data management
- d) duration of data management
- e) the identity of possible data managers having access to data
- f) the rights of the concerned people regarding data management, and also their possibilities for legal remedy, and
- g) in case there is a specified place for taking the data management into data protection report, the registration number of the data management

This data management information regulates the data management of the following web pages:

<http://www.hafner-pneumatika.com> is based on the above standards of content.

The Data management information is available on following links:

Web page: <http://www.hafner-pneumatika.com/adatvedelem>

It can be downloaded from the following link:

<http://www.hafner-pneumatika.com/dokumentumok/pdf/hafner-data-management-information.pdf>

The modifications of the Data Management Information enter into force on the date of announcement on the webpage above. Behind the given chapter titles of the Information, we show the corresponding legal reference.

CONCISE DEFINITIONS (3rd §)

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1. **Stakeholder/User:** Any specified natural person that is identified or can be directly or indirectly identified by personal data
2. **Personal data:** data that can be associated with the stakeholder – especially the name, registration number, or one or more physical, physiological, mental, economic, cultural or social information regarding his identity -, or a conclusion regarding the concerned person, that can be drawn from the data
3. **Special data:**
 - a) personal data regarding racial origin, nationality, political opinion or persuasion, religious or other ideological belief, membership of any advocacy organization, or sexual activity.
 - b) personal data regarding health, pathological addiction, or criminal personal data
4. **Approval:** voluntary and definite statement of intentions of the stakeholder, which is based on correct information, and with which he gives unequivocal permission for managing his data completely or partly through given procedures
5. **Protest:** the statement of the stakeholder, with which he objects to the management of his data, and asks for the termination of data management and for the deletion of managed data.
6. **Data manager:** the natural or legal person, or organization without legal personality, that either individually or together with others defines the aim of data management, makes and implements decisions concerned, including the equipment used for the process, or delegates a data manager to do so.
7. **Data management:** any operation or the total of operations performed on data, regardless of the procedure used, especial the collection, survey, record, systematizing, storage, modification, use, querying, forwarding, publishing, synchronizing or linking, locking, breaking and destruction of data, and prevention of the further use of data, creating a photo, sound- or video record, and the record of any physical attributes (for example finger or palm print, DNA sample or iris image) that can identify the person.
8. **Forwarding data:** making the data available for a given third party
9. **Release:** making the data available for anyone
10. **Data deletion:** making data unrecognizable, in a way that their restoration becomes impossible
11. **Data marking:** give the data an identification mark in order to make it identifiable
12. **Data locking:** give the data an identification mark in order to limit its management temporarily or finally.
13. **Data destruction:** the complete physical destruction of the device the data is stored in;
14. **Data processing:** implementing of technical tasks concerning data management procedures, regardless both of the method or device used for carrying out the procedures, and of the place of implementing, provided that they implement the technical task on the data

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15. **Data processor:** the natural or legal person, or the organization without legal personality, that, based on the contract with the data manager, including contracting based on the order of a law, implements data processing
16. **Organization responsible for data:** the public organization that produced the data of public interest required to be published electronically, or through the operation of which this data was generated.
17. **Data releaser:** the public organization that publishes the data received from the responsible organization on its homepage, in case the organization responsible for data itself does not release the data itself.
18. **Data set:** the total of data managed in the same register
19. **Third party:** a natural or legal person, or an organization without legal personality, that is not the same as the stakeholder, the data manager or the data processor.

THE JUSTICE OF DATA MANAGEMENT (5th-6th §)

1. Personal data is allowed to be managed in case
 - the stakeholder approves it, or
 - the law or – based on the law, in the circle defined in it – the ordinance of the local government orders it, because of an aim based on public interest.
2. Personal data is allowed to be managed also, in case it is impossible or it would cause unreasonable expenses to get the approval of the concerned person, and the management of personal data
 - is necessary because of the legal obligation of the data manager or
 - it is necessary in order to ensure the legitimate interest of the data manager or a third party, and the ensuring of this interest is proportional to the limitation of the law concerning protection of personal data.
3. In case the stakeholder is not able to give his approval because of incapacity or of other unavoidable reason, his data is allowed to be managed to the extent necessary, in order to protect his or others vital interest, and in order to ward off or prevent danger threatening the life, the physical safety or the goods of other people, during the period till the incapacity or other unavoidable reason exists.

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4. In case of an underage user who has already turned 16, the posterior approval or additional permission of his legal representative is not necessary to make the approval statement of the underage user valid.
5. If the aim of data management is to implement the contract signed with the data manager, the contract is required to contain all information that the concerned person should know about personal data management, thus especially the definition of data to be managed, the duration of data management, the aim of the use of data, the fact of data being forwarded, the recipients of it, the fact of using a data manager. The contract is required to state clearly that by signing it, the concerned person approves the management of his data according to what is stated in the contract.
6. If personal data has been recorded with the approval of the user, and there is no distinct legal order against it, the data manager is allowed to use the recorded data,
 - for the aim of fulfilling its legal obligation, or
 - in order to ensure the legitimate interest of the data manager or a third party, and the ensuring of this interest is proportional to the limitation of the law concerning protection of personal data.

ASSIGNMENT OF DATA MANAGEMENT TO A PURPOSE (4th § [1]-[2])

1. Personal data is allowed to be managed solely for a defined purpose, for enforcement of law, or for fulfilling legal obligation. Data management, in each phase of it, has to be in compliance with the aim of data management, and the recording and managing of data has to be fair and legitimate.
2. Personal data is allowed to be managed solely in case it is essential and appropriate in order to fulfill the aim of data management. Personal data can be handled only to the extent and duration that is necessary to reach the aim.

OTHER PRINCIPLES OF DATA MANAGEMENT (4th § [3]-[4])

During data management, personal data keeps its classification as such, till its connection with the stakeholder can be reconstructed. The connection with the stakeholder is reconstructable, in case the data manager does have the technical conditions that make the reconstruction possible.

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During data management, the accuracy, the completeness and, in case it is necessary for reaching the aim of data management, the actuality of data have to be ensured. It also has to be ensured that the stakeholder can be identified only for the duration that is necessary for the aim of data management.

FUNCTIONAL DATA MANAGEMENT

1. Based on the 20th § (1) chapter of the CXII, 2011 law about information autonomy and freedom of information, in the circle of functional operation of the online catalogue and customer website, it is required to define the following:
 - a) the fact of data collection,
 - b) stakeholders,
 - c) aim of data collection,
 - d) duration of data management,
 - e) the identity of possible data managers having access to data,
 - f) information about the rights of the stakeholders regarding data management.
2. The fact of data collection, the circle of managed data: password, first and last name, position, E-mail address, phone number, delivery (depot) address, delivery (depot) name, billing (headquarter) address, billing (headquarter) name, sum to be paid, date of registration, IP address at the time of registration.
3. Stakeholders: all people who registered on the website are concerned
4. Aim of data collection: The provider manages personal data of the users in order to provide full service on the webpage, for example for creating service contracts, defining and modifying the content of them, and for following up the fulfillment of contracts. Also, it manages the data to invoice service fees, enforce its claims related to the fulfillment of contracts, and also for sending newsletters.
5. Duration of data management, deadline for deletion data: Data is deleted immediately after the termination of registration, with the exception of accounting documents, since they are required to be retained for 8 years, according to the 169th § (2) chapter of the Law of 2000 about Accounting.

Bookkeeping documents that directly and indirectly certify the accountancy report (including ledger invoices, both analytical and detailed registers), are required to be retained for at least 8 years, in a format that is readable, and searchable, based on the references of accounting records.

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6. The identity of possible data managers having access to data: Personal data is allowed to be managed, with respect to the principles above, by data manager colleagues.
7. Information about the rights of the stakeholders regarding data management:
The modification of the following data can be performed on the webpages: password, first and last name, position, e-mail address, phone number, delivery (depot) address, delivery (depot) name, billing (headquarter) address, billing (headquarter) name.

The deletion or modification of personal data can be requested by user through the following ways:

- Via post office: on the mailing address of H-9228 Halászi, Püski Street 3.
- Via e-mail: on the email address of ertekesites@hafner-pneumatika.com.

8. Justification of data management: the approval of the User, the 5th § (1) chapter of Information Law, and the 13/A. § (3) chapter of CVIII. Law of 2011 regulating electronic commercial services, and services related to information society (Hereinafter Electronic Commercial Law):

The provider is allowed to manage personal data that is technically essential for providing the service. The provider, while providing its service related to information society, in case other conditions are the same, has to choose and operate the tools of data management used in the process, in a way that personal data management would take place only if it is mandatory for providing the service and for fulfilling other legal aims, but even in this case, it would take place only for the necessary extend and duration.

OUR PRINCIPLES REGARDING FUNCTIONAL DATA MANAGEMENT (Electronic Commercial Law, 13/A.)

1. The provider is allowed to manage natural personal data concerning the service related to information society for invoicing the fees defined in the contract about providing service related to information society: identity data, address, and data concerning the date, duration and place of receiving the service.
2. The provider can manage personal data that are technically essential for providing the services. The provider, in case other conditions are the same, has to choose and operate the tools of data management used in the process, in a way that personal data management would take place only if it is mandatory for providing the service and for fulfilling other aims defined in the Electronic

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Commercial Law, but even in this case, it would take place only for the necessary extend and duration.

3. In case the provider intends to manage data concerning the use of the service, for any other aim, especially for increasing the efficiency of service, for electronic advertising addressed to the customer, or for sending any other addressed content or for market research, it can do so only with preliminary definition of the aim of data management, and with the approval of the customer.
4. Before and through receiving the service related to information society, the service company has to continuously provide the user with the opportunity of prohibiting the management of his data.
5. Managed data has to be deleted when the contract terminates, in case it is not implemented, and after invoicing. Data has to be deleted, if the aim of data management ceases or the customer orders so. Deletion has to be carried out immediately, in case there is no law ordering otherwise.
6. The provider is required to ensure, that the user, before and through receiving the service related to information society, can any time get to know, which types of data is being managed by the provider, and for what aim, also including the management of data that is not directly connected to the customer.

MANAGEMENT OF COOKIES

1. Based on the 20th § (1) chapter of the CXII, 2011 law about information autonomy and freedom of information, in the circle of data management of cookies of the online catalogue and customer website, it is required to define the following:
 - g) the fact of data collection,
 - h) stakeholders,
 - i) aim of data collection,
 - j) duration of data management,
 - k) the identity of possible data managers having access to data
 - l) information about the rights of the stakeholders regarding data management
2. For the use of typical cookies of web shops, like so-called "cookies used for password-protected work procedures", "cookies used for shopping bag" and "safety cookies", it is not necessary to ask for preliminary approval from users.

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3. The fact of data collection, the circle of managed data: unique identification number, dates and appointments
4. Stakeholders: all the visitors of the website are concerned.
5. Aim of data collection: identification of users for recording the content of the "shopping bag", and for the follow-up of visitors.
6. Duration of data management, deadline for deletion of data: in case of session cookies the duration of data management is 8 hours after visiting the homepage.
7. The identity of possible data managers having access to data: Personal data is allowed to be managed, with respect to the principles above, by data manager colleagues.
8. Information about the rights of the stakeholders regarding data management: stakeholders have the opportunity of deleting cookies in the Tools/Settings menu of the browser, generally under the menu point of data protection.
9. Justification of data management: It is not necessary to get the approval of the user, in case the sole aim of the use of cookies is to forward information through the electronic communication network, or in case it is essential to perform the service related to informational society requested by the subscriber or user.
10. The provider measures the visitor's data of the webpage through the service of Google Analytics. While using this service, data is forwarded. The forwarded data is not applicable for the identification of the stakeholders. More information about the data protection principles of Google can be read here: <http://www.google.hu/policies/privacy/ads>

NEWSLETTERS, DM ACTIVITY

1. Based on the 6th § of the XLVIII. Law of 2008 concerning basic conditions and certain restrictions of economic advertising, the user can give a preliminary and explicit approval for the Provider to reach him with its promotional offers and other packages, through the contacts he gave the Provider at the registration, before.
2. Furthermore, the User, keeping in mind the orders of this Information, can also approve that the Provider, in order to send him promotional offers, can manage his personal data.

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3. The Provider does not send unwanted promotional messages, and the User has the possibility of unsubscribing from the sending of offers, for free of charge, without limitation and without any reasoning. In this case, the Provider deletes all his personal data necessary for sending the offers from its register, and does not reach the User with its further promotional offers. The user can unsubscribe from the offers by clicking on the link in the message.
4. Based on the 20th § (1) chapter of the CXII, 2011 law about information autonomy and freedom of information, in the circle of data management while newsletter sending, it is required to define the following:
 - m) the fact of data collection,
 - n) stakeholders,
 - o) aim of data collection,
 - p) duration of data management,
 - q) the identity of possible data managers having access to data,
 - r) information about the rights of the stakeholders regarding data management.
5. The fact of data collection, the circle of managed data: name, e-mail address, dates and times
6. Stakeholders: all people subscribed for the newsletter are concerned.
7. Aim of data collection: sending electronic letter containing promotional offers for the user, providing actual information about products, actions, new functions, etc.
8. Duration of data management, the deadline for the deletion of data: data management is implemented till the withdrawal of the approval, i.e. till the unsubscription.
9. The identity of possible data managers having access to data: Personal data is allowed to be managed, with respect to the principles above, by data manager colleagues.
10. Information about the rights of the stakeholders regarding data management: the user can unsubscribe from the newsletter at any time, for free of charge.
11. Justification of data management: the voluntary approval of the stakeholder, based on the 5th § (1) chapter of the Information Law, and on the 6th § of the XLVIII. Law of 2008 concerning basic conditions and certain restrictions of economic advertising:

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The advertiser, or advertisement provider, or the publisher of the advertisement, in the circle defined in the approval, keeps a record of the personal data of the people who had made an approval statement for them. The data concerning the addressee of the advertisement, recorded in this register, can be used only according to what is stated in the approval, and only till the withdrawal of the approval, and it can be forwarded to a third party only with the preliminary permission of the stakeholder.

FORWARDING DATA

Based on the 20th § (1) chapter of the CXII, 2011 law concerning information autonomy and freedom of information, in the circle of forwarding online catalogue and webpage data, it is required to define the following:

- a) the fact of data collection,
 - b) stakeholders,
 - c) aim of data collection,
 - d) duration of data management,
 - e) the identity of possible data managers having access to data,
 - f) information about the rights of the stakeholders regarding data management.
2. The fact of data collection, the circle of managed data:
 - a) The circle of forwarded data: delivery name, delivery address, phone number, sum to be paid
 3. Stakeholders: All people asking for home delivery
 4. Aim of data management: Home delivery of the ordered product.
 5. Duration of data management, the deadline for the deletion of data: the implementation of the home delivery.
 6. The identity of possible data managers having access to data: Personal data can be managed, with respect to the principles above, by the following:

Transporter:

GLS General Logistics Systems Hungary Package Logistics KFT

H-2351 Alsónémedi, GLS Európa Street 2.

info@glg-hungary.com

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Code of data protection: <https://gls-group.eu/HU/hu/adatvedelmi-szabalyzat>

Hosting provider:

Archi-Host KFT

<http://archi-host.net>

Phone: +36-30-336-1872

E-mail address: info@archi-host.net

Mailing address: Archi-Host KFT

H-4145 Csökmő, Vadvirág Street 22.

Server Room Address: H-1108 Budapest, Kozma Street 2.

Further Data Manager:

Skycentrum Limited Partnership

Headquarter: 1089 Budapest, Golgota utca 3.

Central office: 1024 Budapest, Petrezselyem Street 10. A/B Building 5th Floor, Door Number 16

Mailing Address: Skycentrum Limited Partnership. 1538 Budapest, P.O. Box 515

Phone: +36-30-624-3934

Fax: +36-1-999-5825

7. Information about the rights of the stakeholders regarding data management: the user ask the home service provider data manager for the deleting his personal data as soon as possible.
8. Justification of forwarding data: the approval of the user, the 5th§ (1) chapter of the Information Law, and the 13/A § (3) chapter of the CVIII. Law of 2001 regarding certain aspects of services related to information society

DATA SECURITY

1. The data manager is required to plan and implement data management activities to ensure the protection of the privacy of stakeholders.
2. The data manager, or, in his field of activity, the data processor is required to ensure the security of data, also is required to take technical and organizational actions and to form procedure regulations that ensure the enforcement of the Informational Law, and the other regulations related to data and secret protection.

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3. Data has to be protected with appropriate actions especially against unauthorized access, modification, forwarding, releasing, deletion or destruction, and against accidental destruction, damage, and also against becoming inaccessible because of the changes of technology applied.
4. In order to protect electronically managed data sets, it has to be ensured with appropriate technical solutions, that data stored in the registers can not be connected or linked directly to the user, unless the law allows it.
5. While automatically processing personal data the data manager and data processor ensures the following with further actions:
 - a) prevention of unauthorized data input;
 - b) prevention of the utilization of automatic data management systems by unauthorized people, through data transmission equipment;
 - c) the possibility of monitoring and identifying, with the use of which data transmission equipment and to which servers was personal data forwarded, or can be forwarded to;
 - d) the possibility of monitoring and identifying, what personal data was recorded in the automatic data management system, and by whom and when was it recorded;
 - e) the possibility of restoration of the installed system in case of a breakdown
 - f) that a report is prepared about errors occurring through automatic data management
6. When defining and implementing actions for ensuring data security, data manager and data processor are required to keep in mind the current development level of technology. In case of several possible data management solutions, they are required to choose the one that ensures the higher level of security of personal data, unless it would mean unproportional difficulty for the data processor.

RIGHTS OF STAKEHOLDERS (14.-19th §)

1. The User can request the Provider to provide him information about the management of his personal data. He can also ask for the correction of his data and for the deletion or locking of his personal data, except in case of obligatory data management.
2. For the request of the user, provider gives information about his data managed by the provider, or managed by the data processor delegated by the provider, about the source of data, the aim of

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data management, the justification and duration of it, the name and address of the data processor, about its activity concerning data management, and, in case of forwarding the data of the user, the justification and addressee of data forwarding.

3. In order to control the legality of data forwarding and to inform the user, data manager keeps a register containing the time of forwarding personal data managed by data manager, the justification and addressee of data forwarding, and the definition of the circle of data being forwarded and also containing other data defined in the legal regulation specifying data management.
4. Data manager is required to answer the request as soon as possible, but not later than 30 days after it is submitted, and to give information in a comprehensible, written form. Information is free of charge.
5. For the request of the user, the provider gives information about the data managed by it, about its source, the aim of data management, the justification and duration of it, the name and address of the possible data processor, about its activity concerning data management, and, in case of forwarding personal data of the user, the justification and addressee of data forwarding. Provider is required to answer the request as soon as possible, but not later than 30 days after it is submitted, and to give information in a comprehensible, written form. Information is free of charge.
6. In case personal data does not comply with reality, and the correct data is available for the provider, provider is allowed to correct data.
7. Instead of deleting, provider locks data, in case the user asks for it or in case, based on the available information, it can be presumed that deletion would violate the legitimate interest of the user. Locked data is allowed to be managed only till the data management aim, that excluded the deletion of personal data, exists.
8. Provider deletes personal data, if its management is not legitimate, if the user requests deletion, if the managed data is incomplete or incorrect and this state can not legally be corrected, provided, that the law does not exclude deletion, the aim of data management terminated, or the legally defined deadline for storing the data expired, or it is ordered by the court of justice or the National Authority for Data Protection and Freedom of Information.

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9. Data manager marks data managed by it, in case the user disputes the correctness or accuracy of it, but the incorrectness or inaccuracy of it can not be ascertained clearly.
10. The user and all the ones data has been forwarded to before for data management, have to be informed about correction, locking, marking and deletion. This communication can be omitted, in case regarding the aim of data management it does not violate the legitimate interest of the user.
11. In case the data manager does not fulfill the request of the user for correction, locking or deletion, it has to communicate the factual and legal reasons for refusing the request of correction, locking or deletion within 30 days after the submission of the request. In case of refusing the request for correction, deletion or locking, data manager informs the user about the possibilities for judicial remedy and for contacting the Authorities.

LEGAL REMEDY

1. The User can protest against the management of his personal data, in case
 - a) the management of personal data is necessary only for fulfilling the legal obligation of the Provider, or for ensuring the legitimate interest of the Provider, the Receiver of data, or a third party, unless, data management was ordered by the law;
 - b) the management or forwarding of personal data takes place for direct marketing, for a public opinion survey or a scientific research;
 - c) of other cases defined by the law.
2. Provider examines the protest, makes a decision regarding its justification and informs the user about its decision as soon as possible, but in a maximum of 15 days after the submission of the claim. In case Provider defines the protest as justified, it terminates data management, including further data recording and data forwarding. Provider locks data, and informs all stakeholders to whom the personal data related to the protest was forwarded before about the protest and the actions taken care of based on it. These stakeholders have to take care of actions in order to ensure the enforcement of the right to object.
3. In case the user does not agree with the decision of the Provider, he can go to court within 30 days after the communication of the decision. The court acts in priority.
4. In case of the possible violation of law of the data manager, the user has the possibility to complain at the National Authority for Data Protection and Freedom of Information:

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HAFNER Pneumatika Kft.

H-9228 Halászi, Püski Street 3.

Phone: +36-96-210-601 | Fax: +36-96-210-615

E-mail: ertekesites@hafner-pneumatika.com

Web: www.hafner-pneumatika.com



National Authority for Data Protection and Freedom of Information

1125 Budapest, Szilágyi Erzsébet alley 22/C.

Mailing address: 1530 Budapest, P.O. Box 5.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

JUDICIAL ENFORCEMENT (22nd§)

1. The confirmation of the fact that data management meets the requirements of the law is the obligation of the data manager. The confirmation of the fact that data forwarding meets the legal requirements is the obligation of the recipient of the data.
2. To judgment of the case is the authority of the court of justice. The process, according to the choice of the stakeholder, can be started at the court of justice according to either the permanent or the temporary place of residence of the stakeholder.
3. In the process, there can participate a party that otherwise has no legal capacity concerning cases. The Authority can intervene in the case in order to achieve the win of the stakeholder.
4. In case the court of justice grants the request, it obliges the data manager to give information, to correct, lock or delete data, to annul the decision regarding automatic data management, to acknowledge the stakeholder's right to object, and to hand data requested by the recipient.
5. In case the court of justice rejects the request of the data recipient, the data manager is required to delete the personal data of the stakeholder within 3 days after the communication of the judgment. The data manager is obliged to delete data also in case the data recipient does not go to court within the defined deadline.
6. The court of justice can order the release of its judgment, along with the release of the identification data of the data manager, in case the interest of data protection and the protected legal interest of a larger number of stakeholders require that.

COMPENSATION AND VIOLATION FEE (23rd §)

1. In case the data manager damages someone by the unlawful management of his data or by violating the requirements of data security, it has to compensate the damage.

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2. In case the data manager violates the privacy rights of the stakeholder by the unlawful management of his data or by violating the requirements of data security, the stakeholder has the right to claim a violation fee from the data manager.
3. Against the stakeholder, the data management is liable for the damage caused by the data processor, and the data manager is obliged to pay the violation fee for the stakeholder, also in case the data processor violated the privacy rights of the stakeholder. The data manager is exempted from its liability and from paying the violation fee in case it proves that the damage or the violation of privacy rights was caused by an unavoidable reason outside the scope of data management.
4. The damage is not obliged to be compensated, and the violation fee can not be claimed in case the damage or the violation of privacy rights was caused by the deliberate or serious careless behavior of the stakeholder himself.

CLOSING REMARKS

During the preparation of this information we took into consideration the legislation below:

- CXII. Law of 2011 – concerning information autonomy and freedom of information (hereinafter Information Law)
- CVIII. Law of 2001 – concerning electronic commercial services and certain aspects of services related to information society (especially 13/A § of it)
- XLVII. Law of 2008 – concerning prohibition of unfair commercial practice against customers;
- XLVIII. law of 2008 concerning basic conditions and certain restrictions of economic advertising (especially 6th §);
- XC. Law of 2005 – concerning electronic freedom of information
- C. Law of 2003 – concerning electronic communication (especially 155th §)
- 16/2011 judgment - concerning the EASA/IAB recommendation regarding the best practice of behavior based online advertising

Halászi, 25th August 2014