

## **INFORMATION ON DATA MANAGEMENT PROCESSES RELATED TO THE WEBSITES OPERATED BY SECTRAN KFT.**

SECTRAN Kft. fulfills its obligation to provide information required by Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter GDPR) on the sectran.eu and didb.eu websites (hereinafter: websites) in relation to its data management processes with this information. By participating in specific data management, you become a data subject.

Please note that this report only provides information about data management related to the website.

The rules for the data management of the DiDb system operated exclusively by our company can be found [here](#) in the case of physical card registration and membership management, and [here](#) in the case of e-card registration and membership management.

The privacy guidelines related to the use of the SECTRAN mobile application operated exclusively by our company, can be found [here](#).

---

The data controller is SECTRAN Kft. [company registration number: 16-09-016061, registered seat: 5008 Szolnok, Fazekas Mihály u. 42., info[at]sectran[dot]eu]

SECTRAN Kft. has appointed a data protection officer in order to ensure the legitimacy of data processing, to protect the rights of the data subject and to ensure the exercise of the data subject's rights. Contact information of the data protection officer: dataprotection[at]sectran[dot]eu

### **GENERAL RULES FOR DATA MANAGEMENT**

SECTRAN Kft. has revised its data management information practice based on the experience of the authorities and courts since the GDPR became applicable and will make this data management information public on December 1, 2022, the rules contained herein apply to all data management that begins after that.

As the operator of the *websites*, SECTRAN Kft. informs the visitors of the websites that it handles personal data related to the websites only on the basis of the provisions of this data protection information.

The provisions of this information sheet apply to all processes implemented during the operation of the websites, during which the processing of personal data defined in Article 4, point 1 of the GDPR is carried out.

*„personal data“: any information relating to an identified or identifiable natural person ("data subject").*

The terms used in this report are the same as the explanatory terms defined in Article 4 of the GDPR.

SECTRAN Kft. declares that it only handles data based on the provisions of current legislation, therefore, personal data is handled only and exclusively with the legal grounds included in Article 6 of the GDPR.

During data management, the personal data managed by SECTRAN Kft. preserves the quality of personal data as long as it concerns an identified or identifiable data subject.

SECTRAN Kft. informs that it uses work organization, physical, IT and authorization management tools to ensure that unauthorized persons do not get to know the personal data, and that SECTRAN Kft. employees are obliged to keep the personal data learned during data management confidential.

SECTRAN Kft. draws your attention to the fact that the release of personal data to courts and authorities may be required by law. If a court or authority obliges SECTRAN Kft. to hand over personal data in the course of a procedure established by law, it is obliged to fulfill its legal duty and make the requested data available to the court or authority.

#### **RULES REGARDING THE EXERCISE OF THE RIGHTS OF DATA SUBJECTS**

SECTRAN Kft. informs that based on GDPR III., depending on the legal basis of data processing, you can use the following legal enforcement options:

- a) you can request information about the management of your personal data ("right of access")
- b) you can request the rectification of your personal data ("right to rectification")
- c) you can request the deletion of your personal data if, in your opinion, their processing is illegal, they are not necessary to achieve the purpose they are needed for, or one of the conditions listed in Article 17 (1) of the GDPR is fulfilled ("right to deletion")
- d) you can object to the processing of your data ("right to object")
- e) you can request the restriction of the processing of your personal data ("right to restriction")
- f) you can exercise your right to data portability ("right to data portability")

SECTRAN Kft. draws your attention to the fact that not all data subject rights apply to all data processing, as some data subject rights can only be used in case of specific legal grounds. SECTRAN Kft., in each case of the given data management, specifies which data subject right you are entitled to as a data subject.

Primarily, you submit your request regarding the exercise of the rights of the data subject in writing to the address of the data protection officer of SECTRAN Kft., indicated in this report.

#### **THE RULES ON LEGAL REMEDIES FOR THE AFFECTED PARTIES**

If SECTRAN Kft. does not take action on your request or does not accept the action, you can take legal action against it. You can contact the National Data Protection and Freedom of Information Authority or the court of your place of residence or permanent residence with a complaint about the data management procedure.

#### **COOKIE MANAGEMENT**

Anyone can access the websites of SECTRAN Kft. without revealing their identity or providing their personal data, and they can obtain information freely and without restrictions. However, SECTRAN Kft. collects non-personal information unlimitedly and automatically by using Google Analytic. Nonetheless, individual visitors are not considered affected, because SECTRAN Kft. does not have any information available that could be related to a specific person, the data is statistical in nature. The websites use so-called "cookies" in order to facilitate operation and use, and to monitor the activities carried out on the websites.

You can find further information about Google Analytic here:

<https://support.google.com/analytics/?hl=en#topic=10737980>

#### **SPECIFIC DATA MANAGEMENT FEASIBLE BY USING THE WEBSITES**

##### ***Contacting SECTRAN Kft.***

SECTRAN Kft. can be contacted in person, by phone, in writing and by using the websites. If the person concerned contacts SECTRAN Kft. orally (in person, by phone) and the case in which SECTRAN Kft. was contacted, cannot be resolved immediately, the SECTRAN Kft. employee will make a note about what was said by the person concerned, and hands it over to the person competent to deal with the given type of case.

You can also use the websites to contact SECTRAN Kft. using the form provided on the website. SECTRAN Kft. does not differentiate between contacts based on the information recorded in the contact, so it handles the incoming contacts according to the same data protection rules, from the request for general information to the request for an offer.

In these ways, the person concerned consents to the data management on the basis that they have become familiar with this published report and is aware of this when contacting SECTRAN Kft.

SECTRAN Kft. will store your data until the case related to the contact is resolved.

SECTRAN Kft. draws the attention of all those concerned, to send SECTRAN Kft. only the amount of information that is necessary to handle the given contact case. This is important because SECTRAN Kft. strives to comply with the GDPR's so-called data saving principle, according to which the data controller can only process as much data as is absolutely necessary to achieve a specific data management goal.

***purpose of data management:*** ensuring contact with SECTRAN Kft., handling the submitted case

***legal basis for data processing:*** consent of the data subject in accordance with Article 6 (1) a) of the GDPR

***deadline of data storage:*** until the matter involved is settled (see below, for example, request for quotation)

***Exercisable right of those concerned:***

- a) can request information about the management of their personal data
- b) can request the correction of their personal data
- c) can request the deletion of their personal data if, in their opinion, the data processing is illegal, are not necessary for the purpose to be achieved with them, or one of the conditions listed in Article 17 (1) of the GDPR is met, especially if they revoke their consent to data processing
- ~~d) can object to the processing of their data ("right to object") (since the data management does not take place on the legal basis of Article 6 (1) e) or f) of the GDPR)~~
- e) can request restriction in the processing of their personal data
- f) can exercise their right to data portability

A special type of data management is the request for an offer and the response to it: data management also takes place during the request for an offer to use the services of SECTRAN Kft. If someone requests an offer for SECTRAN Kft.'s services, SECTRAN Kft. will use the data recorded in the contact point according to Act V of 2013 on the Civil Code. it is stored until the offer is binding. The purpose of data management is to prepare an appropriate offer and to communicate said offer to the interested party.

If a contract is created based on the offer, it will be handled by SECTRAN Kft. according to the rules available at the links indicated at the beginning of this report sheet, which will be provided separately when the contractual relationship is established.

***Commonly applicable information for all data management***

SECTRAN Kft. does not forward personal data to recipients within the European Union nor to third countries and does not perform automated decision-making procedures (such as profiling) on the data.

1st of December 2022

SECTRAN Kft.