

## DATA MANAGEMENT BROCHURE BY ZALAY-SPED KFT.

### Dear Partner!

Zalay-Sped Kft. manages data as well. This brochure has been prepared to ensure our partners that the personal data we have learnt related to our company's business activities are managed confidentially, with great caution and in accordance with the legal regulations.

Why is this necessary? Like all economic operators functioning in the EU member countries, Zalay-Sped Kft. is also required to observe the rules of the general regulation on the protection of personal data, that is, the GDPR. This regulation defines the measures related to the protection of personal data, the scope of the data to be protected, and requires the economic operators to comply with the purposefulness, lawfulness, transparency and fairness of the data management.

Zalay-Sped Kft. shall be considered as the data manager within this brochure.

Our contact details: Zalay-Sped Korlátolt Felelősségű Társaság (Limited Liability Company)

registered office: H-8900 Zalaegerszeg, Tompa Mihály utca 1-3.

phone number:

Website: [www.zalay-sped.hu](http://www.zalay-sped.hu)

### What kind of personal data do we manage?

Personal data is any information related to a *natural person* (data subject), on the basis of which, a natural person can be directly or indirectly identified.

*Data management* is:

any operation or the sum of operations carried out on personal data, in particular, the collection, recording, organization, division, storage, transformation, alteration, retrieval, access, use, transmission, distribution, dissemination or making available in any other way, harmonization or interconnection, restriction, deletion or destruction.

### Whose personal data does Zalay-Sped Kft. manage?

Basically, we are affiliated with personal data in the following cases:

1. *the data of our employees* are managed in accordance with the statutory regulations, in connection with the employment relationship, for purposes of fulfilling the employment contract, on the basis of legal regulations on accounting, social insurance and other taxation, so that we can meet our legal obligations (announcement obligation, obligations to pay contributions and taxes). Our employees' personal identification data (name, date of birth, mother's name, place of residence), SIN number, tax number, phone number, e-mail address, education, qualifications and the name of the institution submitting the document which certifies this qualification, this document's registration number, FEOR number, the starting

date, code, cancellation and cessation duration of the employees' insurance relationship, the weekly working hours, and the gross and net personal wage.

The data of our employees are forwarded to the authorities which statutorily require so due to the insurance relationship, and to the accounting office who perform payroll services. Furthermore, the names of our employees are made available to our business partners - for employer interests (in order to make communications possible).

The employees' data are preserved for 5 years following the end of the calendar year when the employment relationship has been terminated, since discarding of the employment-, wage- and social insurance records is prohibited.

Pictures of our employees can also be found on our website, which are based on the written consent of the employees in all cases.

## 2. The personal data of *job applicants*

In this case, the data management is based on a voluntary consent.

Scope of data subjects: All natural persons who apply for the job applications submitted by our company.

The purpose and scope of the managed data: for the identification of the applicants, we need to know the name of the applicants, and their place and date of birth. Furthermore, we require the following data: experiences - name of the previous workplace and the period spent there (this is required for assessment in the aspect of the given position), education, foreign language skills, other data in the CV and in the cover letter (required for assessment in the aspect of the given position).

The data are managed until the closure of the application or for 2 years following the application, on the basis of the applicant's written consent. The purpose of the data management: contact with the applicant, notification about the result of the application.

The personal data of the jobseeker are not forwarded to any third parties.

## 3. The personal data of the drivers and of the *contact persons* of our partners:

We shall hereby inform our respected partners that the names, phone numbers and email addresses of their colleagues they assigned for communication are solely managed for purposes of communication with our partners (third party interests) and the data are used only for mailing and for preparing quotations, and are not given to any third parties.

These personal data are managed until the business relationships with our partners exist. In case of a notification by the contact person regarding deletion, we shall take measures immediately.

We may request the drivers' data for enforcing the interests of our partners, but we preserve these data only during the existence of the given relationship or for 8 years following the termination thereof, in accordance with the regulations of the Accounting Act.

Some of our partners may request the drivers' data for purposes of identification, we always indicate this in advance and we request a prior written consent for this, in which we indicate the scope of the data to be forwarded.

That is, the personal data we manage are managed either on the basis of statutory requirements and for the purpose of fulfilling a contract (such as the personal data of our employees), or on the basis of a consent (data of job applicants), or for enforcing the interests of other parties (data of the drivers and our partners' contact persons).

Furthermore, certain authorities may request information and personal data from us (not only from us, but from any service provider). Such as the courts, the prosecutor's office, the investigating authority and the authority dealing with offences, the administrative authority, the NAIH, the MNB and other authorities empowered on the basis of the law. In the case of such requests, Zalay-Sped Kft. shall provide personal data to the requesting authority to the extent that is indispensably necessary for meeting the purpose of the request - provided that the requesting authority has indicated the exact purpose and the scope of data.

**You can find more information regarding our website's use of cookies and logging description here: <http://www.zalay-sped.hu/adatkezelesi-tajekoztato/>**

*How do we ensure the opportunities to the data subjects specified by the GDPR?*

### **Right to information**

The person whose data we manage might at all times request information - orally or in writing - about the management of his/her personal data, about the purpose of the data management and about the planned period of the data management. Although we make the brochure available at the time of the first encounter and it is submitted on our website, and it is also available at the registered office of our company, we allow the persons who provided their consent to find out what has happened to their data, whether the data is actually safely managed and whether we observe this brochure. We may only provide oral information if the data subject has verified his/her identity.

### **The right to correction**

If the data subject discovers that the data we manage is incorrect or inaccurate, then he/she may ask us to correct them as soon as possible.

### **The right to erasure**

The erasure of the data might be requested if the data management was based on a consent and if the personal data is not required anymore, inasmuch as the purpose of the data collection has been met, in which case the data subject should send an email to this email address: [info@zalay-sped.hu](mailto:info@zalay-sped.hu) with the following text: „I request the immediate erasure of my registered personal data!“. We will fulfil this request if we are not required by law to preserve the data, or if the interests of third parties do not require us to do so.

You can also request the erasure of the data if we have managed the personal data unlawfully.

### **The right to restrict the data management**

The restriction means that we can solely store the data, but we cannot manage the data (to use the data for the specified purposes), unless the data subject gives his/her consent, or the data should be managed for submitting or enforcing legal claims (e.g. in the case of collecting debts, as in such cases, the personal data is forwarded to lawyers to arrange the collection), or the data should be managed for the protection of other natural or legal persons or due to an important public interest.

Restriction may occur in the following cases:

- if the data subject discovers that the data management is unlawful, however, does not request the erasure, but requests the restriction of the data instead, or
- if the data would require correction, and the data subject indicates this, then in this case, the restriction is applicable to the period for checking the accuracy of the personal data, or
- if we do not need the personal data anymore, as the purpose of the data management has been met, but the data subject decides to refuse the data erasure and intends to enforce legal claims against us, because we were not sufficiently discreet.

We will inform the data subject in advance about resolving the restriction.

### **The right to data portability**

We also provide an opportunity for the data subject to receive his/her personal data in typewritten and legible format, if he/she requires so, and to forward these data to another data manager.

If the data management is restricted, or if the data is corrected or deleted, this fact will be communicated to the data subject and to anyone to whom we have forwarded the data.

We will not meet this information obligation if it is impossible or if it is disproportionately difficult.

The data manager shall provide a copy of the personal data subject to the data management to the data subject. For additional copies of data requested by the data subject, the data manager may charge a reasonable fee based on administrative charges. In case the data subject has submitted his/her application by electronic means, the information shall be provided by electronic means as well, unless the data subject requests otherwise.

The data subject might indicate his/her demands listed in this section to us by email. We shall undertake to perform the erasure, restriction, information and data portability within 10 days of the request.

### **Compensation and punitive damages**

If our data management is incorrect because unauthorized persons have obtained the data, or we did not use the data for the specified purposes, or if we lost the data, then the data subject may file a complaint to the Hungarian supervisory authority: Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of

Information) „NAIH” (Contact details: H-1530 Budapest, Pf.: 5., address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c., Phone number: + 36(1) 391-1400, Fax: + 36 (1) 391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

All natural person data subjects are entitled to initiate a lawsuit on the basis of the relevant regulations of Act CXXX of 2016 on the Civil Suit Proceedings, depending on the concrete claim.

Our company aspires to take all measures to remedy any possible complaints, and therefore, we ask the data subjects to firstly contact József Szalay, our company's executive in all cases regarding your complaints, on phone number +36 30 9614 597, or through the [zalayjozsef@tolna.net](mailto:zalayjozsef@tolna.net) email address, in order to find a solution.

Meaning, our company shall be responsible for the orderliness of the data management, the only case to be exempt from this responsibility is when we can prove that Zalay-Sped Kft. is not responsible for the event that has caused the damages.

This data management brochure shall enter into force on the day of publication and shall be valid until revoked, and might be subject to amendment and publication as necessary.

József Szalay executive