

PRIVACY POLICY FOR THIRD PARTIES

Effective date: 1st of April 2021

MAGYARMET[™] Finomöntöde Kft. • FEINGUSS • INVESTMENT CASTING

www.magyarmet.com BIC(SWIFT)KÓD: OTPVHUHB

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ISO 14001 TÜV CERT 97/23/EC, W 0





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1. General provisions

MAGYARMET Finomöntöde Kft. (hereinafter: MAGYARMET Finomöntöde Kft.) advises you about the most important information related to the processing of your personal data acc. to the present Privacy policy (hereinafter: Policy), in particular the purpose, legal basis, scope and duration of the date processing, and your data processing rights and remedies.

MAGYARMET Finomöntöde Kft., as data administrator, ensures that the Policy is available to you when recording your personal data and that you can have access to its content.

Acc. to the Policy MAGYARMET Finomöntöde Kft. treats the personal data provided by you confidentially and takes all possible security, technical and organizational measures that guarantee the security of the data administration.

1.1. Data administrator's data

Company name:	MAGYARMET Finomöntöde Kft.
Headquater:	2060 Bicske, Kanizsai u. 12.
Company reg. nr.:	07-09-025927
Tax nr.:	25196159-2-07
Representative:	GYŐRI Imre, CEO
Telephone:	+36 22 566 310
E-mail:	info@magyarmet.hu
Website:	http://magyarmet.com/

1.2. Scope of the Policy

The Policy applies to the personal data of the natural persons affected by the data management activities of the Company set out in this section.

1.3. Availability of the Policy

MAGYARMET Finomöntöde Kft. assures you that the information on data administration in force can be continuously accessed and viewed under the Downloads/Privacy Policy menu item on the website of MAGYARMET Finomöntöde Kft. (http://magyarmet.com). Of course, on your request MAGYARMET Finomöntöde Kft. will send you a copy of the Privacy policy, which is also available in a signed and printed form at the headquarter of the company.

1.4. Amendments to the Policy

MAGYARMET Finomöntöde Kft. reserves the right to unilaterally amend the Policy.

1.5. Governing law

MAGYARMET Finomöntöde Kft. represents and warrants that its data processing is in compliance with the provisions of the Policy and the laws in effect from time to time, including but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter the GDPR) and

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Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter the Information Act)].

We would like to inform you that in accordance with the recommendation of the National Data Protection and Information Authority dated 29 September 2015 MAGYARMET Finomöntöde Kft. refrains from repeating the text of laws and wants to provide to you the information easily understandable and clear.

1.6. Authenticity, accuracy of the personal data

You are solely responsible for the authenticity and accuracy of the personal data provided by you to the Company in any way. The Company shall not be liable for any deficiencies in the disclosure of information or for any consequences arising from incorrectly provided data, and expressly excludes this in this respect.

2. Purposes, legal bases, scope of data subjects, scope of data processed and duration of data processing

2.1. Data management, if you are a natural person

The purpose of data management: MAGYARMET Finomöntöde Kft., as a contractor, handles the personal data provided by you as a natural person for the purpose of fulfilling the concluded business contract.

Within this data management, the contact details provided by you will be used by MAGYARMET Finomöntöde Kft.

Legal basis of data management: data management is necessary for the fulfillment of the contract concluded between you and MAGYARMET Finomöntöde Kft., in which you are one of the contracting parties [Paragraph 6 (1) (b) GDPR.)].

We would like to inform you that the data management of MAGYARMET Finomöntöde Kft. is considered lawful if the data management is required within the framework of a contract or the intention to enter into a contract. We would also like to inform you that the provision of your personal data is necessary in order for the contract with MAGYARMET Finomöntöde Kft. to be concluded, while the processing of your data is necessary in order for the contract to be fulfilled.

Stakeholders: natural persons contracting with MAGYARMET Finomöntöde Kft.

Scope of data managed: your name, billing address, postal contact information, telephone number, email address, date, time, subject of the message, message.

Duration of data management: Acc. to the Hungarian Civil Code, §§ 6: 21 - 6: 25. (ref. to general limitation period), as being data administrator, MAGYARMET Finomöntöde Kft. is oblidged to store your personal data for 5 (five) years from the termination of the contract concluded with you for the submission, enforcement or defense of your legal claims [Paragraph 17 (3) (e) GDPR]. We would like to inform you that if MAGYARMET Finomöntöde Kft is obliged to keep the data on the basis of § 169 of Act C on Accounting of 2000, it is obliged to keep the data for 8 (eight) years and only then is entitled to delete them.

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2.2. Data management, if you are the representative or contact person of the contracting legal entity

The purpose of data management: if you, as a natural person, are the legal representative (senior executive, including the managing director) or contact person of the legal entity contracting with MAGYARMET Finomöntöde Kft., MAGYARMET Finomöntöde Kft. needs to administrate your data. Within this framework, the contact details provided by you will be used by MAGYARMET Finomöntöde Kft.

Legal basis for data processing: the data processing is based on your consent as a data subject [Paragraph 6 (1) (b) GDPR].

Please be informed that consent is a voluntary, specific and well-informed and clear statement of your will, by which you indicate, by means of a statement or unequivocal statement of consent, that you consent to the processing of personal data concerning you.

Stakeholders: representative or contact person of the legal entity contracting with MAGYARMET Finomöntöde Kft.

The scope of the managed data: the name, telephone number, e-mail address, date, time, subject of the message, message of the legal representative or contact person of the legal entity contracting with MAGYARMET Finomöntöde Kft.

Duration of data management: Acc. to the Hungarian Civil Code, §§ 6: 21 - 6: 25. (ref. to general limitation period), as being data administrator, MAGYARMET Finomöntöde Kft. is oblidged to store your personal data for 5 (five) years from the termination of the contract concluded with you for the submission, enforcement or defense of your legal claims [Paragraph 17 (3) (e) GDPR]. We would like to inform you that if MAGYARMET Finomöntöde Kft is obliged to keep the data on the basis of § 169 of Act C on Accounting of 2000, it is obliged to keep the data for 8 (eight) years and only then is entitled to delete them.

2.3. Data management for direct business acquisition

Purpose of data management: you can request quotations from MAGYARMET Finomöntöde Kft. by filling in a quotation form and submitting it on the website http://magyarmet.com. MAGYARMET Finomöntöde Kft. carries out this direct business acquisition activity specifically on the basis of your consent, so we will provide you with the Policy during the submission of the form.

Legal basis for data processing: the data processing is based on your consent [§ 6 (1) (a) and (b) GDPR, § 6 (1) of the Act XLVIII on the basic conditions and certain restrictions of commercial advertising of 2008]. We would like to inform you that your statement of consent to the direct acquisition may be withdrawn at any time, without restriction or justification, free of charge. In case of revocation, MAGYARMET Finomöntöde Kft. will immediately delete all your data processed for this purpose and will not send you any marketing offers.

The scope of the managed data: your name, e-mail address, telephone number.

Stakeholders: You, as the natural person giving the consent.

Duration of data processing: we will process the data until your consent is revoked.



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2.4. Data management in connection with applying for a job offer

Purpose of data management: by filling in the career / application form and submitting it on the website http://magyarmet.com, you can apply for the job(s) advertised at MAGYARMET Finomöntöde Kft. in relation to a specific job. MAGYARMET Finomöntöde Kft. performs the data management within this recruitment activity specifically on the basis of your consent, so we will ensure that the Prospectus is available to you during the filling in of the form and the submission of the application material.

Legal basis for data processing: data processing is based on your consent [Paragraph 6 (1) (a) GDPR]. We inform you that your statement of consent can be revoked at any time, without restriction or justification, free of charge. In case of revocation, MAGYARMET Finomöntöde Kft. will immediately delete all your data processed for this purpose.

Scope of data managed: your name, e-mail address, telephone number, subject of the message, message, date, time, all personal data provided in your application.

Stakeholders: You, as the natural person giving the consent.

Duration of data processing: we will process the data until your consent is revoked.

2.5. Data management in connection with direct business acquisition, including the sending of a professional newsletter

Purpose of data management: if you wish to subscribe to a professional newsletter on the website http://magyarmet.com, MAGYARMET Finomöntöde Kft. will handle the personal data necessary for sending the newsletter on the basis of your previous, clear and express consent.

Legal basis for data processing: the data processing is based on your consent [Paragraph 6 (1) (a) GDPR], XLVIII of 2008 on the basic conditions and certain restrictions of commercial advertising. Paragraph 6 (1) of the Act]. We would like to inform you that MAGYARMET Finomöntöde Kft. provides you with the opportunity to unsubscribe from the professional newsletter. Accordingly, your consent can be revoked at any time, without restriction or justification, free of charge. In case of revocation, MAGYARMET Finomöntöde Kft. will immediately delete all your data processed for this purpose and will no longer send you a professional newsletter.

Stakeholders: you, as a natural person subscribing to a professional newsletter.

The scope of the managed data: your name, e-mail address, telephone number, postal address. Duration of data processing: we will process the data until your consent is revoked.

2.6. Data management for cookies placed on the website by third parties

The purpose of data management: MAGYARMET Finomöntöde Kft. uses cookies.

About the cookie: A cookie is a small, simple package of data that collects data about visitors to our website, which allows us to obtain more information about your use of our website, allows the website to store and analyse certain information about your use of the website, in addition to browsing, we provide you with the best user experience.

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Google Analytics is Google's analytical tool, which helps MAGYARMET Finomöntöde Kft. to get a more accurate picture of the activities of its website visitors. These cookies help MAGYARMET Finomöntöde Kft. to optimize their advertising campaigns by compiling detailed statistics. It is important that these cookies report statistics about website usage without uniquely identifying visitors to Google. Google Analytics follows up, where visitors clicked on a website, how much time they spent on it, and where they are located. In addition to reports from site usage statistics, Google Analytics can also be used to display more relevant ads MAGYARMET Finomöntöde Kft. on Google services (such as Google Search) and across the Internet, and to measure interactions related to the ads displayed by Google Analytics. Legal basis for data processing: data processing is based on your consent [§ 6 (1) (a) GDPR]. If you do not wish to receive cookies, please set your browser to delete, block or alert cookies from your hard drive before storing them. We inform you that your consent can be revoked at any time, without restriction or justification, free of charge.

Scope of data managed: Your IP address, location, time, duration and frequency of visits to the website.

Duration of data processing: we will process the data until your consent is revoked.

2.7. Data management for the customer satisfaction questionnaire

The purpose of data management: you can help our work and the providing of even higher level of professional service to you by filling in a customer satisfaction questionnaire regarding the activities of MAGYARMET Finomöntöde Kft. and sending it to us. This customer satisfaction questionnaire is a feedback to MAGYARMET Finomöntöde Kft. regarding the quality of our work and your satisfaction with it. We will only process the information you provide in the Customer Satisfaction Questionnaire with your prior, clear and express consent.

Legal basis for data processing: data processing is based on your consent [Paragraph 6 (1) (a) GDPR]. Your consent can be revoked at any time, without restriction or justification, free of charge. In case of revocation, MAGYARMET Finomöntöde Kft. will immediately delete all your data processed for this purpose.

Stakeholders: natural persons who complete the customer satisfaction questionnaire and contribute to the data management.

The range of data managed: name, e-mail address, and answers to some questions of the questionnaire.

Duration of data management: MAGYARMET Finomöntöde Kft. will delete your data provided in the customer satisfaction questionnaire from its systems immediately after the expiry of the existing contract, or even earlier if you have withdrawn your consent to data management in the meantime.

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3. Information on the use of data processors

The data processor is a natural or legal person who handles personal data on behalf of MAGYARMET Finomöntöde Kft. as a data administrator.

MAGYARMET Finomöntöde Kft. informs you that it uses the following data processors during its data management:

Name	Company name, headquarters, other contact information	Description of activity performed	The scope of the managed data
MEDIACENTER HUNGARY Informatikai, Szolgáltató és Üzemeltető Kft.	MEDIACENTER HUNGARY Kft. Headquater: 6000 Kecskemét, Sosztakovics utca 3. 2. em. 6., Postal address: 6001 Kecskemét, Pf. 588 E-mail: <u>mediacenter@mediacenter.hu</u> Tel.: +36 76 / 506-618 Fax: +36 76 / 575-024	MAGYARMET Finomöntöde Kft. own website hosting provider	Website data storage and backup (incl. Form submissions)
Google (Google Analytics)	https://www.google.com/about/datace nters/	Recording website usage data for statistical and ad targeting purposes (third-party cookies)	Cookie data
Infor Finance: HU Ügyviteli modul	Corvex Zrt. Headquater: 2014 Csobánka, Hanfland körút 21. Premise: 1082 Budapest, Baross u. 114-116. E-mail: <u>erp@corvex.hu</u> Tel.: +36 1 / 459-5700 Fax: +36 1 / 459-5799	MAGYARMET Finomöntöde Kft. performing accounting duties	In points 2.12.3. listed data handling
InforCOM ERP vállaltirányítási rendszer	Corvex Zrt. Headquater: 2014 Csobánka, Hanfland körút 21. Premise: 1082 Budapest, Baross u. 114-116. E-mail: <u>erp@corvex.hu</u> Tel.: +36 1 / 459-5700 Fax: +36 1 / 459-5799	MAGYARMET Finomöntöde Kft. corporate management duties	In points 2.12.3. listed data handling
NEXON Humánügyviteli rendszer	Nexon Kft. Headquater: 1138 Budapest, Váci út 185. E-mail: <u>nexon@nexon.hu</u> Tel.: +36 1 / 465-5100 Fax: +36 1 / 465-5101	HR system management	Employee contracts, licensing processes, employee records

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4. The range of persons entitled to access the data, data transmission, information on data security measures

The personal data provided by you can be obtained by the employees of MAGYARMET Finomöntöde Kft. with access rights related to the purpose of data management, these are the following:

Purpose of data management	The range of persons entitled to access the data in the access right system of MAGYARMET Finomöntöde Kft.
Data management during the performance of the contract (see points 2.1. and 2.2.)	CEO, secretariat, executives, commercial department, financial department, marketing department
Data management for direct business acquisition (see point 2.3.)	CEO, secretariat, executives, commercial department, marketing department, IT department
Data management for submitting a job application (see point 2.4.)	executive, HR department
Data management for sending a professional newsletter (see point 2.5.)	marketing department
Data management related to cookies on the website (see point 2.6.)	marketing department, Google Analytics analyst

We would like to inform you that MAGYARMET Finomöntöde Kft. does not transfer your personal data to third parties under any circumstances.

MAGYARMET Finomöntöde Kft. takes appropriate data security measures in order to protect the personal data provided by you. As part of this, it protects its IT systems, which also contain personal data stored in electronic form, with a multi-level password.

5. The range of persons entitled to access the data, data transfer, information on data security measures

You have the right to request access, rectification, cancellation or restriction of the processing of your personal data from MAGYARMET Finomöntöde Kft., you may object to the processing of personal data, and you also have the right to data portability.

Below we describe the content of each of your rights in connection with data management, as well as certain features of your exercise of rights.

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5.1. Right of access

You are entitled to receive feedback from MAGYARMET Finomöntöde Kft., as the data administrator, as to whether the processing of your personal data is in progress. If such processing is in progress, you have the right to access personal data and the following information:

- the purposes of data management;
- the categories of personal data of the data subject;
- the recipients or categories of recipients to whom the personal data have been or will be _ communicated;
- the intended duration of the storage of personal data;
- your rights with regard to data processing (including in particular the right to rectification, cancellation or restriction of data processing and the right to object);
- the right to lodge a complaint with the supervisory authority;
- all available information on the source of the data; the fact of automated decision-making, including profiling, and at least understandable information about the logic used and the significance of such data management and the expected consequences for you.

MAGYARMET Finomöntöde Kft., as data administrator, will provide you with a copy of the personal data, which is the subject of data processing. MAGYARMET Finomöntöde Kft. may charge a reasonable fee based on administrative costs for the additional copies you request. If you submitted the application electronically, the information will be provided by MAGYARMET Finomöntöde Kft. in electronic form, unless you request it otherwise. The right of access is set out in point 5.8. can be exercised through the contact details provided in.

5.2. Right to rectification

You have the right to request the correction of inaccurate personal data concerning you, which MAGYARMET Finomöntöde Kft. is obliged to comply with without undue delay. Taking into account the purpose of the data processing, you have the right to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary statement.

5.3. Right to cancel (right to efface)

You have the right to delete personal data concerning you at your request from MAGYARMET Finomöntöde Kft. without undue delay. MAGYARMET Finomöntöde Kft. deletes your personal data without undue delay, if the purpose or legal basis of the processing has ceased, if you object the data processing and there is no priority of legal reason for the data processing, if the personal data has been processed unlawfully, or if the personal data must be deleted in order to fulfill a legal obligation, prescribed by European Union or member state law, applicable to MAGYARMET Finomöntöde Kft. as the data administrator.

We would like to inform you that MAGYARMET Finomöntöde Kft. may refuse to delete your personal data if the data processing is necessary to fulfill the obligation under EU or member state law applicable to MAGYARMET Finomöntöde Kft.

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5.4. Right to restrict data processing

You are entitled to request from MAGYARMET Finomöntöde Kft., to restrict the processing of your personal data, if

- you dispute the accuracy of personal data (in this case, the restriction applies to the period of а. time that allows the data administrator to verify the accuracy of the personal data); or
- b. MAGYARMET Finomöntöde Kft.'s data management is illegal and you are opposed to the deletion of the data and instead request a restriction on their use; or
- c. MAGYARMET Finomöntöde Kft. no longer needs personal data for data management purposes, but you request them to submit, validate or protect legal claims, or
- you have objected to the data processing. d.

We inform you that if the processing is subject to a restriction, such personal data, with the exception of storage, may only be obtained with your consent or for the purpose of making, enforcing or protecting legal claims or protecting the rights of another natural or legal person or the Union or a member state important public interest.

5.5. The right to data portability

You are entitled to receive the personal data concerning you provided by you to MAGYARMET Finomöntöde Kft. in a structured, widely used, machine-readable format, and to transfer this personal data to another data administrator if the data processing is based on consent or contract and the data management is automated.

In exercising the right to data portability, you have the right, if technically feasible, to request the direct transfer of personal data between data administrators.

5.6. Right to protest

You have the right to object at any time against the data processing of MAGYARMET Finomöntöde Kft. Necessary for the enforcement of its legitimate interests for reasons related to your situation, including profiling. In the event of a protest, MAGYARMET Finomöntöde Kft. may not further process the personal data, unless MAGYARMET Finomöntöde Kft. proves that the data processing is justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the data subject or related to the enforcement or protection of. You also have the right to object to the processing of your personal data, including profiling, processed for the purpose of direct business acquisition at any time, in which case the personal data may no longer be processed for this purpose.

5.7. Right to withdraw consent

You have the right to withdraw your consent at any time. Your contribution is set out in points 2.3-2.6 of the Policy in the case of the data management purposes mentioned in. We would like to inform you that the legal basis of the consent does not affect the lawfulness of the data management before the revocation.

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H-2060 Bicske, Kanizsai u. 12. Adószám: 25196159-2-07 EU VAT No. HU25196159 AS 9100 Rev. C ; ISO 9001 Bank: OTP Bank Rt. - Bicske IBAN (HUF) HU55 11736020 20015336 00000000 E-mail: info@magyarmet.hu IBAN (EUR) HU04 11763361 12824885 00000000 BIC(SWIFT)KÓD: OTPVHUHB





5.8. Rules of procedure

We would like to inform you that you can notify MAGYARMET Finomöntöde Kft. on your request concerning the exercise of any of its data processing rights through the following contacts:

- in person at the headquarters of MAGYARMET Finomöntöde Kft.: H-2060 Bicske, Kanizsai u. 12.
- in writing by post: H-2060 Bicske, Kanizsai u. 12.
- electronically: info@magyarmet.hu

MAGYARMET Finomöntöde Kft. will inform you about the assessment of your application and the measures taken without undue delay, but no later than within 25 days from the receipt of your application. If you submit a large number of applications or your application is particularly complex, MAGYARMET Finomöntöde Kft. may extend the 25-day deadline by another 2 (two) months, but will inform you of the justification and reasons for the extension within 25 days of receiving the request. MAGYARMET Finomöntöde Kft. notifies of its decision in writing or - in case of an application submitted electronically - electronically.

If MAGYARMET Finomöntöde Kft. does not take action in connection with your application, it will inform you without delay, but no later than within 1 (one) month from the receipt of the request, of the reasons for not taking action and that you can file a complaint with a supervisory authority and have the right for judicial redress.

MAGYARMET Finomöntöde Kft. provides the information and measures free of charge.

If your request is clearly unfounded or - especially due to its repetitive nature - excessive, MAGYARMET Finomöntöde Kft., as data administrator, is entitled after taking into account the administrative costs involved in providing the requested information or taking the requested action to

- charge a reasonable fee, or а.
- to refuse to react on the request. b.

The burden of proving that the application is clearly unfounded or excessive lies with MAGYARMET Finomöntöde Kft.

We would like to inform you that the detailed rules of your data processing rights can be found in Chapter III of the GDPR, entitled "Rights of data subjects", as well as in Info Act. 14.-21. § are included.

6. Enforcement options

Among the enforcement options, you have the opportunity to initiate two procedures, which are described below.

6.1. Right to complain to the supervisory authority

You have the right to lodge a complaint with the Hungarian National Data Protection and Freedom of Information Authority (hereinafter: NAIH) as a supervisory authority, if in your opinion, the processing of personal data concerning you violates the GDPR regulation.

Contact details of the National Data Protection and Freedom of Information Authority Headquoter: 1125 Budapest, Szilágyi Erzsébet fasor 22./c. Postal contact: 1530 Budapest, Pf. 5



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Telephone: Official email address: Address of the authority's website: +36 1 391 1400 ugyfelszolgalat@naih.hu https://naih.hu

However, before initiating the procedure, we ask you to send your complaint to MAGYARMET Finomöntöde Kft. as a data administrator.

6.2. Right to a judicial remedy

You are also entitled to a judicial remedy against a legally binding decision of the supervisory authority concerning you. You are also entitled to legal redress if the supervisory authority does not deal with your complaint or does not inform you of the procedural developments or the outcome of your complaint within 3 (three) months. You may also choose to bring an action before the court having jurisdiction over your place of residence or stay.

7. The data protection incident and its circumstances, effects, measures taken to prevent it

Please, note that a data protection incident is a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal information that is transmitted, stored, or otherwise handled.

MAGYARMET Finomöntöde Kft. shall notify the data protection incident to the competent supervisory authority without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is not likely to endanger your rights and freedoms. In order to ensure this, MAGYARMET Finomöntöde Kft. will take all necessary measures.

MAGYARMET Finomöntöde Kft. will inform you about the data protection incident without undue delay if it is likely to pose a high risk to your rights and freedoms. In such a case, MAGYARMET Finomöntöde Kft. Clearly and intelligibly describes in the information provided to you the nature of the data protection incident, the probable consequences arising from the incident, and the measures taken or planned to remedy the incident, including measures to mitigate any adverse consequences arising from the incident.

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