

Data of the controller service provider

Its name: NN Energetikai Megoldások Kft.

Its address: 8373 Rezi, Ambrus M. u. 10.

Location of data processing: 8373 Rezi, Ambrus M. u. 10.

Its e-mail address: nnenergetikai@icloud.com

Its phone number: +36 30-339-0307

Its representative: Krisztián Náhol, Managing Director

Principles of data processing

NN Energetikai Megoldások Kft. is committed to the protection of personal data of visitors, and considers respecting their right to informational self-determination as high priority. **NN Energetikai Megoldások Kft.** processes the personal data of visitors confidentially, and takes all safety, technical, and organisational measures to ensure the safety of data.

Below we introduce our principles on data processing and the requirements we have formulated for ourselves as data controllers and we comply with these. Our principles on data processing are in accordance with the laws related to data protection, particularly the following:

REGULATION (EU) No 679/2016 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (April 27, 2016) on the protection of personal data of natural persons regarding data processing and on the free movement of such data, and the repeal of Directive 95/46/EC (General Data Protection Regulation).

Act CXII of 2001 on Informational Self-determination and Freedom of Information.

Act CVIII of 2011 on certain issues of electronic commerce services and information society services.

Act C of 2003 on Electronics Communications.

Act XLVIII of 2008 – on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

Act LXVI of 1992 on Keeping Records on the Personal Data and Address of Citizens (Nytv.) – Act CXIX of 1995 on the Use of Name and Address Information Serving the Purpose of Research and Direct Marketing

Act V of 2013 on the Civil Code,

and all laws that contain provisions on obligatory orders related to data processing.

The concept of data protection relies on informed and voluntary consent, which we strive to reach at all phases during the use of the services.

The legal basis of the processing:

The data processing is performed based on the voluntary consent of visitors and registered visitors of the <https://nnpower.hu/> website. The registration includes filling in a form with personal data, and the acknowledgement of the provisions in the Privacy Policy.

1. Performance of Contract
2. Performance of legal obligation
3. Based on consent

Rules on subscription to newsletter:

The visitors of <https://nnpower.hu/> use the service voluntarily. They acknowledge that the newsletter service of **NN Energetikai Megoldások Kft.** cannot be used without registration for the service. Anyone can subscribe to the newsletter, and by doing so, they accept that **NN Energetikai Megoldások Kft.** – using the e-mail address – can send them newsletters, and in case of accepting the advertisement and marketing materials, information on business offers and calls.

The legal basis of the processing is: the consent of the data subject.

The User /Data subject can unsubscribe from the newsletter at any time by pressing the unsubscribe button in the newsletter, or in writing, by sending an electronic letter to the nnenergetikai@icloud.com e-mail address. After receiving such information on the unsubscription, the Service Provider takes care about the deletion of the e-mail address from the address list of the newsletter without delay, but with 1 (one) working day at the

latest, and ensures that from that date the User /Data subject should not receive a newsletter and other electronic ad, promotion or marketing materials from the central addresses of **NN Energetikai Megoldások Kft.** The period for which the personal data will be stored: until the newsletter service works, or until the withdrawal of the consent (request to delete) by the data subject.

Data collected and processed during the subscription for newsletter:

- name (Christian name, family name)
- e-mail address

Data collection by third party service providers: The html code of the <https://nnpower.hu/> website, and the html code of the newsletters sent might contain references from an outside server and references to an outside server.

The recipients or categories of recipients of the personal data: the employees of **NN Energetikai Megoldások Kft.** involved in tasks related to customer service, marketing activities, and **NN Energetikai Megoldások Kft.** as data processor. Its IT service provider in order to provide hosting services.

Social media principles / Data processing on the social media pages of NN Energetikai Megoldások Kft.

NN Energetikai Megoldások Kft. maintains a Facebook page in order to introduce and promote its products and services.

The questions posted on the pages of **NN Energetikai Megoldások Kft.** are not considered as an official complaint.

The personal data published by the visitors of the pages of **NN Energetikai Megoldások Kft.** are not processed by the Company.

Regarding the visitors the terms and conditions on data protection and services of the given social media are governing.

In the case of publishing an offensive content or a content that violates the law, **NN Energetikai Megoldások Kft.** can exclude the data subject from the members without preliminary notice, or can delete his/her comment.

NN Energetikai Megoldások Kft. is not accountable for data contents and posts violating the law posted by the users on the social media pages. The **NN Energetikai Megoldások Kft.** is not responsible for errors, failures due to operation of the social media portals, or for the problems from the altered operation of the system.

RIGHTS RELATED TO DATA PROCESSING:

Right to request information: Anyone can request information through the contact details provided about the type of data processed by the organization, the legal basis, the specific purpose of the processing, the sources and the duration. Upon request the information should be sent to the given contact detail without delay, but within 30 days at the latest.

Right to rectification: Any person can request the amendment of his/her data through the contact details provided. Upon request the amendment shall be performed without delay, but within 30 days at the latest, and a notice should be sent to the contact details provided.

Right to deletion: Any person can request the deletion of his/her data through the contact details provided. Upon request the deletion shall be performed without delay, but within 30 days at the latest, and a notice should be sent to the contact details provided.

Right to locking, restriction: Any person can request the locking of his/her data through the contact details provided. The locking shall last until the reason given justifies the storage of the data. Upon request this shall be performed without delay, but within 30 days at the latest, and a notice should be sent to the contact details provided.

Right to object: Any person can object to the processing of data through the contact details provided. The objection shall be examined within the shortest period of time starting from the submission, but within 15 days at the latest, and a decision must be made as to whether the objection is reasoned, and a notice should be sent about the decision using the contact details provided.

Amendment of the rules on data processing and the privacy policy:

The Service provider can modify this regulation unilaterally at any time. The Service Provider is obliged to disclose the regulation, its amendment, and the amendment integrated into the Privacy Policy and the Information within the Portal in an easily visible

place, on the starting page of the Portal, or in a place directly accessible from it; in a format suitable for storage, reading, and printing.

Judicial remedy options of the data subjects:

1., Court

If the rights of the data subject have been violated, the data subject can submit a case against controller to the Court, the competent General Court, in the capital to the Metropolitan Court of Budapest within 30 (thirty) days from the last day of the deadline, or from the notice about the decision, if the Service Provider fails to meet the deadline set by Privacy Act. The law-case can be started at the competent general court according to the place of residence or the habitual residence of the data subject. The court shall handle the issue out of turn. It is the obligation of the controller to prove that the data processing complies with the provisions of the law.

2., Process of the supervisory authority:

In the case of encroachment upon a data subject's rights in connection with personal data, he/she can make a complaint to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH), President: dr. Attila Péterfalvi, seat: 1024 Budapest, Szilágyi Erzsébet fasor 22/C, postal address: 1530 Budapest, P.O.Box: 5, Phone: +36-1-391-1400, Fax: +36-1-391-1410; web: www.naih.hu).

Definitions for data processing

GDPR: (General Data Protection Regulation) the regulation of the European Union on Data Protection

personal data: data that can be linked with the data subject, subject to the processing – especially the name and the e-mail address of the data subject.

In a more detailed way: any defined data (identified or suitable for identification) that can be related to a natural person (data subject), conclusions on the data subject that can be concluded from the data. During data processing the personal data keep this feature as long as their connection with the data subject can be restored. A person can be considered identifiable especially when he/she can be identified – directly or indirectly – based on name, identification number, or one or more than one factor related to his/her identity based on physical, physiological, mental, economic, cultural or social identity;

special data:

a) data revealing racial, national or ethnic origin, belonging to a minority, political opinions or party membership, religious or philosophical beliefs, trade union membership,

b) data concerning health, pathologic addiction, a natural person's sexual orientation, personal data of criminal nature;

consent: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, signifies – full or partial – agreement to the processing of personal data relating to him or her;

objection: the declaration of the data subject, in which the data subject objects to the processing of his/her data, and requests the termination of the processing of the data and the deletion of the processed data;

controller: means a natural or legal person, or organization without legal personality, who or which determines the purpose of the data processing, makes the decisions on data processing (including the means used) and implements those, or has them implemented by the data processor it had contracted;

data processing: means any operation or set of operations performed on the data, regardless of the applied method, such as collection, recording, organisation, storage, alteration, use, forwarding, disclosure, alignment or combination, locking, erasure or destruction; and preventing further use of the data. Making photos, recording voices and pictures is considered as data processing as well, together with recording of physical features suitable for the identification of the person (e.g. finger or palm print, DNA-sample, iris pattern);

transfer of data : when the data are made accessible for a certain third person;

disclosure: when the data are made accessible to anybody;

deletion of data: making the data unrecognisable in a way that excludes the possibility of restoration;

locking of data: making the transfer, access, disclosing, transformation, alteration, destruction, deletion, connection or alignment and use of the data impossible finally or for a determined period of time;

destruction of data: full physical destruction of the data or the devices containing these;

data processing: performing the technical tasks related to the data processing transactions, regardless of the applied method and means, and the place of use;

data processor: the natural or legal person, or organization without legal personality, who or which performs the processing of personal data according to the instruction by controller;

third person: natural or legal person, or organization without legal personality, who or which is different from the data subject, the controller or the data processor;

third country: all countries that are not members of the of the European Economic Area.

Service Provider: NN Energetikai Megoldások Kft. Seat: 8373 Rezi, Ambrus M. u. 10. Corporate tax number: 23833650-2-20 Company registration: 20-09-072427

Service: the services provided by the Service Provider and used by the Users, where the Service Provider has the right at its own discretion to determine and to alter the scope of these services at any time, to terminate certain services, to introduce new services, and to modify the existing services. The services include among others Service provider's on-line game, on-line administration, service and function for sending newsletters, and all the other services provided by the Service Provider temporarily or on a permanent basis.

All further information can be found at the relevant section of the European Council here: https://ec.europa.eu/info/law/law-topic/data-protection/reform_hu

Applied data processing principles

Personal data can be processed if

a) the data subject has consented, or

b) it has been ordered by law or order of the local government based on the authorization from law, within the determined scope. Special data can be processed if the consent of the data subject was given in writing, or when the law orders to perform it.

The data subject can also give his/her consent within the framework of the agreement concluded with the controller in order to perform the agreement. The agreement should include all information which the data subject has to be aware of in connection with the processing of personal data, especially the definition of the data to be processed, the duration of the data processing, the aim of the use, the forwarding of the data, employment of data processor.

The agreement has to include unmistakably that, by signing it, the data subject consents to the processing of his/her data in line with the agreement.

Personal data can be processed exclusively for a determined purpose, in order to exercise a right and to perform an obligation. Data processing shall comply with this purpose in all phases of the data processing.

Only those personal data can be processed that are essential and suitable for reaching the aim of the data processing, and only to the extent and for the time necessary for the fulfilment of that aim.

Personal data cannot be processed without proper and informed consent.

The data subject has to be provided with detailed information on all facts about the processing of his/her data in clear and plain language, especially about the purposes and the legal basis of the data processing, the identity of the party authorized to control and to process the data, the duration of data processing, and the parties with whom the data can be shared. The information has to include the rights and remedies of the data subject related to data processing.

The processed personal data have to comply with the following requirements:

- a) the data are collected and processed fairly and according to the law;
- b) the data are correct, complete, and if needed, updated;
- c) their storage method is suitable to ensure that the data subject can be identified only for the time period necessary for the purpose of the storage.

It is forbidden to use a general and uniform personal identification mark (e.g. personal identification number) that can be used without limitation.

The personal data can be forwarded, and the different data processing can be connected if the data subject consented to it, or if the law permits to do so, and of all conditions of data processing are fulfilled regarding each personal data.

Personal data (including special data) can only be transferred from the country to a data controller or data processor located in a third country – regardless the data medium or the method of the transfer – if:

a) the data subject has explicitly consented, or

b) the law permits it, and during the control and the processing the transferred data in a third country the adequate level of protection for the personal data is secured.

The data transfer to the members of the of the European Economic Area should be considered as a data transfer within the area of the Republic of Hungary.

The data controller and the data processor – within its scope of activities – are obliged to secure the safety of the data (*see the details later¹*), furthermore it has to make those technical and organizational measures and create such rules on the processes that are necessary in order to enforce the rules on data protection and confidentiality.

The data should be protected especially against unauthorised access, alteration, transmission, disclosure, erasure or destruction, and accidental destruction and damage. In order to secure the technical protection of personal data, the controller, the data processor, and the operator of the telecommunication or IT asset should take separate protection measures, if the transmission of personal data is performed through networks or other information technology devices.

The data subject can request information on the processing of his/her data, can request the personal data to be rectified, or – unless the law requires the data processing – their deletion.

Upon request of the data subject, data controller provides information on the personal data it controls, and on his/her personal data processed by its contracted data processor, about the purpose of the data processing and the duration of the legal basis, the name, address (seat) of the processor and their activity related to data processing, moreover about the recipients of the personal data together with the purpose of sharing the data. Data controller has to provide the information in writing and in plain language within the shortest possible time after the submission of the request, but not later than 30 days. This information is free of charge, unless that year the petitioner has already submitted a request to the data controller regarding the same area. In such cases costs might be charged. The personal data must be deleted when its processing is against the law, if the data subject requests it, if the purpose of the data processing has terminated, or the deadline set for storing the data by law has expired, or the court or the data protection supervisor ordered its deletion.

The data subject and all the parties to whom the data has been forwarded for processing have to be informed about the rectification and the deletion. Such a notification is not required if the purpose of the data processing does not violate the legitimate interest of the data subject.

The data subject can object to the processing of his/her personal data, when the processing (transmission) of the personal data is necessary exclusively for the enforcement of the right or the legitimate interest of the receiver of the data, except when it has been ordered by law; when the use or the transmission of the personal data is performed for the purpose of direct marketing, public opinion polling, or scientific research; or when the law permits exercising the right of objection.

The processor has to suspend the data processing immediately, and to examine the objection within the shortest period of time starting from the submission of the request, but within 15 days at the latest, and a written notice should be sent to the petitioner about the result. If the objection is justified, the controller has to stop the data processing – including the recording and the transfer of data – and to lock the data, and to inform all parties to whom it transferred the personal data involved in the objection about the objection and all the related measures, and these parties are obliged to take steps in order to enforce the right to object.

Data processing related to the newsletter of **NN Energetikai Megoldások Kft.**: personal data are not shared with third parties without the preliminary and explicit consent of the data subject. The statistics created from personal data of the users are transferred to third parties exclusively after the removal of the information connecting it to the person who has provided the data. When transferring data using this method, there is no way to reproduce any of the personal data of the person who provided it by using any process.

The **NN Energetikai Megoldások Kft.** will not connect the data collected at <https://nnpower.hu/> with data collected from other sources.

NN Energetikai Megoldások Kft. does not transfer the data of the users to third countries (to countries that are not members of the European Economic Area). **NN Energetikai Megoldások Kft.** does not collect special data (data revealing racial, national or ethnic origin, belonging to a minority, political opinions or party membership, religious or philosophical beliefs, trade union membership, data concerning health, pathologic addiction, a natural person's sexual orientation, personal data of a criminal nature) about its users.

The visitors of <https://nnpower.hu/> use the service voluntarily. They acknowledge that the newsletter service will be available only after registration.

When authorised by law **NN Energetikai Megoldások Kft.** is obliged to issue personal data for the authority requesting it, if all criteria are met then it will fulfil the request. The visitor and the one using the service (user) acknowledges this, and will have no objection against it.

NN Energetikai Megoldások Kft. receives the users' request for the modification of data, provision of data, for erasure of data, and questions about the information on data processing, and it will reply as soon as possible, but within 30 days at the latest. Ask your question in writing!

Security of the data¹

The Owner takes all possible measures to ensure the safety of your personal data. It stores some of the data in encrypted form, while other data are not accessible even for the Owner without identification. The Owner stores the data on several independent devices, and uses the services of several independent companies, organizations.

Access to the personal data is strictly limited to the person involved in the task, and to the contracted parties, and to the extent that is necessary for the performance of their task, and these are subject to a duty of secrecy and confidential data processing. The provisions of the valid contract reflect the performance of tasks and the data processing by third persons.

The scope of data involved

recording the technical type of data of the visitors of the website and the readers of the newsletter: During the visit to the website and the opening of the newsletters **NN Energetikai Megoldások Kft.** records the IP address of the users, from which in some cases it is possible to make conclusions on the data subject; in addition to this it records the type of the operation system, the browser, and the address of the visited page. The saving of the data is performed primarily for technical purposes, it is essential for the continuous operation of the system. Further purpose of the processing is the analysis of the users' customs, preparing statistics on the visitors, which support the provision of services of even higher level. **NN Energetikai Megoldások Kft.** will not connect the data gained through the analysis of the log files with other data, and it will not strive to identify the user.

Data collection by third party service providers: The html code of the <https://nnpower.hu/> website, and the html code of the newsletters sent might contain references from an outside server and references to outside server.

data for registration – subscription for newsletter: Due to its function the newsletter of **NN Energetikai Megoldások Kft.** can be requested only by registered users. The registration includes the provision of the e-mail address, and then the confirmation process (double opt-in system), during which NN Energetikai Megoldások Kft. checks whether it is really the authorized party requesting the newsletter. The provision of data is voluntary, it can be withdrawn at any time.

NN Energetikai Megoldások Kft. shall not disclose or share such data with third parties. By providing the service provider with their e-mail address the users consent to receiving technical type of messages from the service provider. Upon request **NN Energetikai Megoldások Kft.** will delete the given e-mail address and the name received by the confirmation from the system.

The user can unsubscribe from the newsletter at any time following the description in the newsletter. The newsletters might contain advertisement messages.

Managing the visitors' data on the website of NN Energetikai Megoldások Kft. – Information on the use of cookies

The cookies are short data files placed on the user's computer by the visited site. The purpose of the cookie is to assist the given infocommunication, internet service, and to make it more comfortable. There are several types of cookie, but in general these can be classified into two groups. One is the temporary cookie, which is placed by the website on the user's device during a certain task (e.g. the security identification for using the internet banking); the other type is the permanent cookie (e.g. the language preference for a website), that remains on the computer of the user until the user decides to delete it. According to the directive of the European Council cookies cannot be placed on the user's device without the consent of the user [except if these are essential for the use of a certain service].

In the case of cookies that do not require the consent of the user, the information has to be provided during the first visit of the website. It is not necessary to include the full text of the information on the cookies at the website, it is enough if the operators of website briefly summarize the essential information, and use a link where the full information is available.

In the case of cookies requiring the consent of the user, the provision of information can be connected to the first visit on the website if the data processing based on cookies already starts at the time of visiting the site. If the use of the cookie is connected to a function explicitly requested by the user, then the information can be shown in connection with the request regarding the use of this function. In this case, again it is not necessary to include the full text of the information on the cookies at the website, it is enough to have a short summary on the essential information, and the use of a link where the complete information is available.

At the website we inform the visitors about the use of cookies as part of the Privacy Policy.

Contact, remedy

The owner of the <https://nnpower.hu/>, the newsletter of **NN Energetikai Megoldások Kft.** is:

NN Energetikai Megoldások Kft

Its seat: 8373 Rezi, Ambrus M. u. 10.

Its phone number: +36/30-339-0307

Its e-mail address: nnenergetikai@icloud.com

Representative: **Krisztián Náhol**

Data controllers: **Krisztián Náhol**

With option for remedy, complaint, please contact the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH)!