

DATA MANAGEMENT INFORMATION

1. INTRODUCTION

Pursuant to Regulation No 2016/679 of the European Parliament and of the Council (EU) referred as GDPR Regulation), the person concerned must be informed before the start of the processing of personal data:

- the business and, if any, the name and availability of the Data Protection Officer;
- indicate the purpose for which the data is collected; data categories; the legal basis for data management and the duration of their storage;
- if the data processor is transmitted to an external data processor, this fact, the name of the data processor and its seat; the categories of transmitted data, the duration of data management, and the consequences of the transmission;
- we need to provide information on whether to transmit data outside the EU, as well as the existence, logic and consequences of automated decision-making;
- we must inform the data subject that you may receive the data collected at your request because you have the right to access and to inform your other data protection rights;
- separately that you have the right to submit a complaint to the data protection authority and may contact the court; and that you have the right to withdraw your consent at any time if the legal basis of data processing is the consent;
- Finally, we will inform you of the consequences of denying contribution.

The information must be provided in writing, but it may also be given orally upon request, provided that the person concerned properly proves their identity. The information must be provided free of charge. In the case of data obtained from a third party or a public source, we must inform the data subjects about our data processing in accordance with the above list within one month of receiving the data.

It is not necessary to apply the notice if the data subject already has the information.

2. BASIC DATA

Name of the data controller: Design and Build Hungary Kft.

Registered office: 2220 Vecsés. Üllői út 809/A.

Company registration number: 13 09 233862

Tax number: 32550872-2-13

Email address: info@dbhungary.com

Phone number: +36 20 290 0684

This data protection notice governs the data processing on the following websites:

<https://www.dbhungary.com/>

<https://www.dbhungary.hu/>

3. MEANING OF TERMS

Data File: The sum of data managed in a registry.

Data Processing: The execution of technical tasks related to data processing, regardless of the method and tools used for the execution, as well as the location of the application, provided that the technical task is performed on the data. In the interpretation of this regulation, data processing particularly includes every technical data processing operation that does not require substantial decision-making, which the data processor performs on the basis of a contract with the data controller, including the conclusion of a contract based on the provisions of legislation.

Data Processor: The natural or legal person, or an organization without legal personality, who or which performs data processing on the basis of a contract concluded with the data controller - including the conclusion of a contract based on the provisions of legislation -.

Data Carrier: The physical form of the data, its storage location, including documents.

Data Subject: The natural or legal person, or an organization without legal personality, who or which submits a request to the data controller regarding the processing, correction, deletion, or blocking of their personal data.

Data Processing: Any operation or the sum of operations performed on data, regardless of the procedure applied, including in particular collection, recording, organization, storage, transmission, publication, coordination or linking, blocking, alteration, use, querying, deletion, and destruction. This also includes preventing further use of the data, making photographs, sound, or image recordings, as well as recording physical characteristics suitable for the identification of a person (e.g., fingerprint, palm print, DNA sample, iris image). In the interpretation of this regulation, data processing particularly includes the decision-making related to individual data processing operations, issuing instructions.

Data Controller: The natural or legal person, or an organization without legal personality, who or which independently or together with others determines the purpose of data processing, makes decisions and implements them regarding data processing

(including the equipment used), or has them implemented by a data processor entrusted by them.

Personal Data: Data that can be associated with an individual. In particular, the name, identification mark, and any knowledge characteristic of one or more physical, physiological, mental, economic, cultural, or social identity of the individual, as well as the conclusion that can be drawn from the data regarding the individual.

Data Processing Incident: A breach of security that causes the accidental or unlawful destruction, loss, alteration, or obstruction of access to transferred, stored, or otherwise processed personal data.

4. LEGAL BASES FOR THE POSSIBILITY OF DATA PROCESSING

4.1. CONSENT

The legal basis for the lawful processing of personal data is that the processing of personal data must be based on one of the legal bases regulated by the GDPR.

In the case of data processing based on consent, the Data Controller shall only process personal data if the consent is given on a voluntary basis, is informed, serves a specific purpose, clearly defines all reasons for the data processing, is the result of an explicit and positive action. Before the consent is given, the data subjects must always receive clear and simple language, visible, revocable and an informative notice explaining the possibility of withdrawal of consent. The information must always be concise, understandable and easily accessible, provided in clear language and in a manner that is understandable to everyone.

The information notice must necessarily contain the following points:

the contact details of the data controller and the data protection officer;

it must be indicated for what purpose the data are collected;

the categories of data must be indicated;

the legal basis for the data processing must be indicated,

the period of storage;

It must also be disclosed if other data processors will have access to the data;

Do we transfer the data outside the EU;

Inform the person concerned that they can obtain the collected data, as they have the right to access it;

Inform about their data protection rights;

Inform that they have the right to file a complaint with the data protection authority;

and they have the right to turn to the court;

Inform that they have the right to withdraw their consent at any time;

Inform about the existence of automated decision-making based on data processing, its logic, and its consequences;

finally, inform about the consequences of refusing to give consent.

The information must be free of charge.

4.2. CONTRACT PERFORMANCE

The proper basis for data processing is the need for it under a contract or the intention to enter into a contract. It should be narrowly interpreted, meaning that in the case of data processing leading to the conclusion of a contract, the fulfillment of the contract no longer constitutes a valid legal basis for data processing.

4.3. COMPLIANCE WITH LEGAL OBLIGATIONS

Data processing can be based on the fulfillment of an obligation under Union or national law. The obligation must be mandatory and based on legislation, in which case the purpose of the data processing must also be defined by the Union or national legislation.

4.4. VITAL INTEREST

The vital interest as a legal basis for data processing can be applied when the processing is necessary to protect the vital interest of the data subject or another natural person.

The vital interest as a legal basis is applicable only to a limited extent, exclusively in the event of a serious emergency situation.

4.5. PUBLIC INTEREST DATA PROCESSING

Public interest data processing can be applied as a legal basis when the processing is necessary for the performance of a task in the public interest or for the exercise of a public authority vested in the data controller. This includes cases where data is requested from the Data Controller to fulfill a public task and the provision of personal data is not based on an authority's request or legislation.

4.6. LEGITIMATE INTEREST

In the case of legitimate interest, the processing of personal data is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

To determine whether the data subject's interests or fundamental rights and freedoms override the Data Controller's legitimate interest, the so-called balancing test must be

carried out. The written documentation of the balancing test should include why the planned personal data processing is necessary, how the data controller would carry it out, and what guarantees it would maintain to protect the interests of the data subjects throughout the process.

5. THE RIGHTS OF THE INDEBTED

5.1. TRANSPARENT INFORMATION

The obligation to inform the data subjects is the responsibility of the data controller, which serves to implement the principle of transparency. The data subjects must be informed about the data controller's contact details, the essential conditions of the data processing, the rights of the data subjects, and the possibilities for exercising legal rights.

Information must also be provided to the data subjects in cases where personal data is not collected from them. The deadlines for providing information in both cases are as follows:

if personal data is collected from the data subject, at the time of data collection,

if personal data originates from other sources, the data subjects must be informed within one month from the date of obtaining the data (if the data is used for contact purposes, at the time of the first contact).

The information provided is a guarantee for the exercise of the rights of the data subject, and therefore the data subject must be informed

in an understandable and transparent manner

mainly in writing (electronic means are also included), and orally at the request of the data subject,

free of charge.

5.2. RIGHT OF ACCESS

The right of access serves to implement the principle of transparency. Upon the request of the data subject, it must be confirmed to them whether their personal data is being processed, and if so, access must be provided to them to their processed personal data, as well as access must be provided to the following information:

the purpose of the data processing,

the categories of personal data being processed,

the recipients,

the planned duration of storage,

the rights of the data subject,

the right to submit a complaint (right to redress)

the fact of automated decision-making, including profiling.

5.3. RIGHT TO CORRECTION

This right ensures compliance with the principle of accuracy. If the data processed by the Data Controller is not accurate, the data subject may request the correction or supplementation of any inaccurate personal data concerning them.

5.4. RIGHT TO WITHDRAW

A data controller is required to delete the relevant personal data upon the request of the data subject if

there is no longer a need for the data for the purpose for which they were collected or otherwise processed, the data subject withdraws their consent and there is no other legal basis for data processing,

the data subject objects to the data processing based on their own situation for reasons of legitimate interest or the performance of a public task, including profiling, and there is no overriding legitimate reason for the data processing, or objects to marketing activities,

the personal data have been processed unlawfully,

the personal data must be deleted to comply with a legal obligation under Union or national law applicable to the data controller.

The data controller is not required to delete the data upon the request of the data subject if any of the following exceptions apply. Personal data relating to the data subject may not be deleted if the data processing is necessary

for the exercise of the freedom of expression and information,

for the fulfillment of a legal obligation under Union or national law applicable to the data controller, or for the performance of a task carried out in the public interest or in the exercise of official authority,

for reasons of public health,

for the purposes of public interest archiving, scientific and historical research, or statistical purposes, if it is likely that the deletion would make it impossible or seriously impair this data processing.

to submit, enforce, or defend data-related requests.

5.5. RIGHT TO RESTRICT DATA PROCESSING

When data is restricted, the Data Controller may only store the personal data but not process it in any other way. An exception is made for data processing with the consent of the data subject, or for the submission, enforcement, or defense of legal claims, or for the protection of the rights of natural or legal persons, or for data processing for important public interest reasons of the Union or a Member State.

The data subject may request the restriction of their processed personal data in the following cases:

if the data subject disputes the accuracy of the personal data, the restriction applies for the period during which the data controller verifies the accuracy of the personal data,

if the data processing is unlawful, but the data subject objects to the erasure of the data and instead requests the restriction of their use,

if the data controller no longer needs the personal data for the purpose of processing, but the data subject requires them for the submission, enforcement, or defense of legal claims,

if the data subject objects to the processing based on legitimate interests or the performance of a task carried out in the public interest, including profiling, and the restriction applies for the period until it is determined whether the legitimate grounds of the data controller override the legitimate grounds of the data subject.

5.6. RIGHT TO DATA PORTABILITY

The right to data portability is a new right introduced by the GDPR, which ensures the free flow of data within the European Union. The data subject may exercise this right if the data processing is based on consent or for the performance of a contract and is carried out automatically.

The right to data portability is not a general right, but the data subject may exercise it only in the above-mentioned case. If the data subject exercises their right, they are entitled to receive the personal data relating to them in a machine-readable format, or to request that the data controller directly transfer the personal data relating to them to another data controller.

5.7. RIGHT TO OBJECT

The data subject shall have the right to object at any time to processing of personal data concerning him or her, on grounds relating to his or her particular situation, based on legitimate interests of the data controller or of a third party, or on grounds of public interest. The consequences shall, as a general rule, be that the data controller may no longer process the personal data.

Exception: If the data controller proves that compelling legitimate reasons for data processing exist, which outweigh the interests, rights and freedoms of the data subject,

or are related to the submission, enforcement or defense of legal claims, the data controller is entitled to further process the personal data in these cases.

Special provisions apply to the right of objection in the case of direct marketing activities. In this case, if the data subject objects to the processing of the data, including profiling, the data controller may not further process the personal data (for this purpose).

5.8. RIGHT OF LEGAL REMEDY

The affected party has the right to submit a complaint to the supervisory authority (the right to file a complaint) and to judicial remedy.

Supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information

(NAIH) (address: 1055 Budapest, Falk Miksa Street 9-11., phone: +36 (1) 391-1400, website: <http://naih.hu>), to whom the data subject is entitled to submit a complaint if they consider that the processing of their personal data violates the GDPR.

The person concerned and the data controller/processor may exercise their right to judicial remedy before the court of the Member State where the supervisory authority is established, against the decision of the supervisory authority, and challenge the decision.

The data subject has the right to go directly to the court if, in their opinion, their rights under the Regulation have been violated due to the improper handling of their personal data. According to the provisions of the Infotv., the competent court is the district court of the data subject's place of residence or place of stay.

6. PRESENTATION OF THE DATA PROCESSING OF THE SERVICE PROVIDER

The Data Controller also uses the assistance of data processors and services in its activities.

1. Data processing related to the company's website / cookie management

The purpose of the data processing	Identification of website visitors/customers, making contact available to them
The legal basis for the data processing	Consent to the processing of data
Name of the legal basis for data processing	GDPR Article 6(1)(a)

Scope of the data subjects	visitors to the dbhungary.com and dbhungary.hu websites
Data for stakeholders	The start and finishing date for the user's visit, and in some cases, depending on the setting of the user's computer, is the browser and operating system type. The Data Controller manages the user's email address and username to use the website's login applications.
The source of data	visitors to the dbhungary.com and dbhungary.hu websites
Duration of data processing	2 years from the recording of the data
The technical nature of data management	electronic
Data processing	
Name of the data processor	Perfect Nova Hungary Zrt.
The address of the data processor	2161 Csomád, Levente Street 14/A
Your activity related to data management	Website operation
Actual data management, data processing location is email and telephone connection	1036 Budapest, Nagyszombat str. 1., info@perfectnova.hu , +36 70 9479-042, https://perfectnova.hu/adatmedelmi-nyilatkozat

7. Server Logging

When visiting the Data Controller's website, the web server automatically logs the user's activities.

Purpose of data management: When visiting the website, the Service Provider records visitor data to check the operation of the services, personalized service and prevent abuse.

Legal basis for data management. Article 6 (1), (f) of the GDPR, as the data controller and the storage service provider have a legitimate interest for the safe operation of its website.

Type of personal data processed: IP address, date, time, and the title of the visited page.

The title of the visited pages, as well as the IP address, date, and time data, are not sufficient on their own to identify the person concerned.

The portal's hm code contains references from an external server independent of the Data Controller and to an external server. The external service provider's server connects directly to the user's computer. The providers of the links are able to collect user data (such as IP address, browser, operating system data, mouse movement, visited page title, and visit time) through direct connection to their server.

The IP address is a series of numbers that uniquely identifies the computers and mobile devices of users accessing the internet. With the help of IP addresses, the location of the computer used by the visitor can be geographically located. The title of the visited page, as well as the date and time data, are not sufficient on their own to identify the person concerned, but when combined with other data, they are suitable for drawing conclusions about the user.

8. USE OF COOKIES AND DATA COLLECTION

The definition of a cookie: a small text file containing data that is stored on the user's computer when visiting a website. Its purpose is to allow websites to remember what the user has been doing on the site during their visit. This can store data such as whether the user has clicked on certain links or pages, logged in with their username, or read certain pages on the site months or even years earlier.

Categories of cookies:

- 1) Essential cookies, which are essential for users to browse the website and use its features. Without these, the provision of services on the website, registration, and login are not possible. These cookies do not collect user data for marketing purposes.
- 2) Performance cookies collect information about how the website is used, informing the provider about the frequency of page visits and error messages. They do not collect personal data suitable for identifying individuals, and all information is anonymized.
- 3) Functional cookies enable personalized settings for serving users, such as language settings and text size. The provider does not use functional cookies for marketing or other advertising purposes.

4) Targeted cookies link the provider's website to social networks:

<https://www.dbhungary.com/> , <https://dbhungary.hu/>

User consent is required for the use of cookies. If the user does not accept the use of cookies, certain functions will not be available to them. More information on deleting cookies can be found on the following links:

Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=enGB>

Edge: <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

Safari: <https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>

IMPORTANT COOKIE CATEGORIES:

predictionio - User identification cookie for personalized ad recommendations.

Duration: 3 months.

Google Adwords cookie - When someone visits the site, the visitor's cookie identifier is added to the remarketing list.

Google uses cookies, such as the NID and SID cookies, in its products, such as to customize ads visible in Google Search.

The AdWords conversion tracking feature uses cookies. Cookies are placed on the user's computer to track sales and other conversions resulting from ads when the user clicks on an ad.

Some common uses of cookies include selecting ads based on relevance to the user, improving campaign performance reports, and avoiding displaying ads that the user has already viewed.

Google Analytics cookie: Google Analytics is a Google tool that helps website and app owners get a more accurate picture of visitor activity.

The service may use cookies to collect information and generate reports on website usage statistics without individually identifying visitors to Google.

The main cookie used by Google Analytics is the "ga" cookie. In addition to generating reports on website usage statistics, Google Analytics - along with some of the

advertising cookies mentioned earlier - can also be used to display more relevant ads in Google products (such as Google Search) and across the internet.

RTB personalized retargeting cookies: For previous visitors or users, they may appear on other websites within the Google Display Network when searching for expressions related to their browsing or to their products or services.

Workflow cookie-k: These cookies store the visitor's location and browser language, with a lifespan of browser closure or a maximum of 2 hours.

Reformer cookie-k: These cookies record from which external page the visitor arrived on the site. Their lifespan is until the browser is closed.

Backend identifier cookie: The identifier of the backend server serving the site. Its lifespan is until the browser is closed.

9. PROFILE CREATION ON THE SERVICE'S WEB PAGES

In the case of the Data Controller's website, profile creation is a marketing tool that allows for the creation of automatic decisions, intelligent, personalized offers, and discounts based on customer behavior.

According to the GDPR, the service provider's web pages must provide the option for visitors to refuse the use of profiling. By doing so, the customer limits the use of their personal data only to the fulfillment of the order.

10. DECISIONS BASED ON AUTOMATED DATA PROCESSING

The goal of the GDPR is to ensure the widest possible protection of the personal data of the data subjects. With the rapid development of technology, data controllers increasingly use software or algorithms for the processing of personal data to gain economic benefits, improve the user experience, or speed up decision-making. However, the application of these technologies poses risks to personal data, so the GDPR pays special attention to this area.

11. EXCLUSIVELY AUTOMATED DATA PROCESSING BASED DECISIONS

According to the GDPR, the data subject has the right to request that decisions based solely on automated data processing not apply to them if they have legal or contractual rights affected or if they are significantly affected (do not affect their rights but influence their living conditions).

In three cases, however, still allow such decision-making:

1) if necessary for the conclusion or performance of a contract, because profiling, for example, leads to more consistent and impartial decision-making, reduces the risk of clients missing payment deadlines by shortening the decision-making time, and has an enhancing effect on efficiency.

2.) EU or Hungarian law allows it.

3.) With the explicit consent of the affected person.

If the exception under points 1) - 2) applies, the data controller is required to provide appropriate guarantees: separate information to the data subject (about the data processing, the logic applied in decision-making, etc.), the right of the data subject to request human intervention, the opportunity for the data subject to express their opinion or receive an explanation of the decision made on the basis of such an assessment, the opportunity for the data subject to challenge the decision.

12. PROFILE CONSTRUCTION

Automated processing of personal data, which involves evaluating personal characteristics related to the data subject. This includes, in particular, the analysis or prediction of personal characteristics related to the data subject's economic situation, job performance, personal preferences, health status, or reliability.

The data controller does not apply automated decision-making based on data processing during data processing, but uses profiling exclusively for its own business purposes after the user's specific, explicit consent to accept marketing cookies.

If the customer does not allow the use of marketing cookies when accepting cookies, the use of their personal data is limited to the fulfillment of the order.

13. DATA SECURITY

Az data controller has assessed the risks associated with its data processing activities and evaluated them according to various criteria, considering the severity of the risks and the likelihood of their occurrence.

Az Data Controller ensures the necessary authorization management, internal organizational, and technical solutions during the operation of its information systems related to the website, so that your data does not fall into the hands of unauthorized persons, unauthorized persons cannot delete the data, extract it from the system, or modify it. We also enforce data protection and data security requirements against our data processors.

We keep a record of any potential data protection incidents and, if necessary, inform about the incidents that arise.

The Data Controller applies password protection on its computers and provides its information technology equipment with firewall protection.

Internet communication between the User and the Website is encrypted end-to-end, via the https (http+ssl) protocol.

14. RIGHTS AND LEGAL REMEDIES

You are always entitled to request information by post, electronic, or telephone through the contact details specified in the notice on the following channels about the personal data we process that relates to you.

Upon your request, we will inform you:

about the processed data,

the purpose of the data processing,

the legal basis,

about the duration,

about who and for what purpose receive or have received their data.

The information will be provided in writing within 30 days of the submission of the request, depending on the form of the request, either in paper or electronic form.

You may object to the processing of your personal data at any time. We will examine the objection as soon as possible, but no later than 30 days from the date of submission, decide on its justification, and inform you of the decision.

You are always entitled to request the deletion of the personal data we process, or to request the correction of incorrectly recorded personal data.

In addition, we will block your personal data if you request it, or if it is apparent from the information available to us that the deletion would violate your legitimate interests. We will process the blocked personal data until the processing purpose or legitimate interest that excludes the deletion of the personal data persists.

The data subject may request, through the contact details provided in this notice, that the processing of their personal data be restricted by the Data Controller (with clear indication of the restricted nature of the data processing and the separate processing of other data) if

- they dispute the accuracy of their personal data (in this case, the Data Controller will restrict the processing until it checks the accuracy of the personal data);
- the processing is unlawful and the data subject objects to the deletion of the data and instead requests the restriction of their use;
- the Data Controller no longer needs the personal data for the purpose of processing, but the data subject requires them for the establishment, exercise or defense of legal claims; or
- the data subject has objected to the processing of their data (in this case, the restriction applies until it is determined whether the legitimate reasons of the data controller outweigh the legitimate reasons of the data subject).

You are entitled to receive your personal data provided to the Data Controller in a widely used machine format through this prospectus, and you are entitled to transfer this data to another Data Controller without hindering it.

The access, cancellation, rectification, restrictions, media, and locking applications will be met and notified as soon as possible, but not more than 30 days. If we were unable to apply, we will be notified within 30 days.

If the data is transmitted to another person with his consent, the recipient of the data transmission will also be notified of the necessary steps.

If your personal data is processed on the basis of your consent, you are entitled to withdraw your consent at any time. You can withdraw your consent by requesting your Controller's contact details in this prospectus.

If you are visually impaired or old -age, you may request the Data Controller at contact information set out in this Data Management Information to make available the contents of the data processing information in a word (text) format or in the capital.

In addition, with the eligible complaint it is possible to find the
National Data Protection and Freedom of Information Authority
1055 Budapest, Falk Miksa street 9-11.

www.naih.hu,

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu)

or CXXX of 2016 on the Civil Code pursuant to the Court of Jurisdiction and jurisdiction, to enforce the rights of the processing of personal data.

You can find the competent court at the link below:

<https://birosag.hu/birosag-kereso>

You can exercise your permissions listed in this Prospectus at any time if you contact the Data Controller via email or otherwise in writing. In the context of your request, you may ask the person to identify yourself or to enter other information that applies to the person, which are used to justify the eligibility. You can contact the Data Controller at the contact details set out in section 2.

Budapest, 01/04/2025

Design and Build Hungary Kft.

Data Controller