

## PRIVACY POLICY

### 1. CONCEPTS, DEFINITIONS

**data subject:** any natural person identified or - directly or indirectly - identified on the basis of personal data;

**personal data:** any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;

**data of public interest:** in the management of a body or person performing state or local government tasks, as well as other public tasks defined by law, related to its activities, or generated in connection with the performance of its public tasks. information or knowledge recorded in any way or form that does not fall under the concept of personal data, regardless of the way it is handled, its independent or collective nature, so in particular the competence, competence, organizational structure, professional activity, its evaluation including its effectiveness, the types of data held and the data on legislation governing operations, as well as on management and concluded contracts;

**public data in the public interest:** all data that does not fall under the concept of public interest data, the disclosure, knowability or making available of which is ordered by law in the public interest;

**consent:** the voluntary and firm declaration of the data subject's will, which is based on adequate information, and with which he gives his unequivocal consent to the processing of his personal data - in full or covering certain operations;

**protest:** the statement of the data subject objecting to the handling of his personal data and requesting the termination of the data processing or the deletion of the processed data;

**data controller:** the natural or legal person or organization without legal personality who, or which independently or jointly with others, determines the purpose of data management, makes and implements decisions regarding data management (including the device used), or has them implemented by the data processor commissioned by it;

**data management:** regardless of the procedure used, any operation performed on the data or the set of operations, including in particular the collection, recording, recording, organization, storage, change, use, query, transmission, disclosure, coordination or connection, locking, deletion and destruction, and preventing further use of the data, taking photographs, audio or video recordings, and recording physical characteristics suitable for identifying the person (e.g. fingerprint or palm print, DNA sample, iris image);

**data transmission:** making the data accessible to a specified third party item;



**disclosure:** making the data available to anyone;

**data deletion:** making data unrecognizable in such a way that their recovery is no longer possible;

**data designation:** providing the data with an identification mark for the purpose of distinguishing it;

**data blocking:** providing the data with an identification mark for the purpose of limiting its further processing permanently or for a specified period of time;

**data destruction:** complete physical destruction of the data carrier containing the data;

**data processing:** performing technical tasks related to data management operations, regardless of the method and tool used to perform the operations, as well as the place of application, provided that the technical task is performed on the data;

**data processor:** a natural or legal person, or an organization without legal personality, who processes data on the basis of the contract with the data controller, including the conclusion of a contract based on the provisions of the law;

**data controller:** the body performing a public task, which produced data of public interest that must be published electronically, or whose operation generated this data;

**data informant:** the body performing a public task, which - if the data controller does not publish the data - publishes the data provided by the data controller on the website;

**data file:** the totality of the data managed in one register;

**third party:** a natural or legal person or one without legal personality

**EEA state:** a member state of the European Union and another state that is a party to the Agreement on the European Economic Area, as well as the state whose citizen is the European Union and its member states, as well as a state that is not a party to the Agreement on the European Economic Area, on the basis of the European Economic Area He enjoys the same legal status as a citizen of a state party to the Territorial Agreement;

**third country:** any state that is not an EEA state

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## 2. GUIDELINES FOR DATA MANAGEMENT

Personal data can be processed if

- the person concerned consents to it, or



- it is ordered by law or - based on the authority of the law, within the scope defined therein - by a local government decree.

Manage personal data only for specific purposes, exercising rights and fulfilling obligations

may be for the sake of All stages of data management must comply with this purpose.

Only such personal data can be processed that is essential for the realization of the purpose of data management, suitable for achieving the purpose, and only to the extent and for the time necessary for the realization of the purpose.

Personal data can only be processed with consent based on appropriate information.

The data subject must be informed - clearly, clearly and in detail - about all the facts related to the management of his data, including in particular the purpose and legal basis of the data management, the person entitled to the data management and data processing, the duration of the data management, and who can see the data. The information must also cover the data subject's rights and legal remedies.

The processed personal data must meet the following requirements:

- their admission and treatment is fair and legal;
- they are accurate, complete and, if necessary, timely;
- the method of their storage is suitable so that the person concerned can only be identified for the time necessary for the purpose of storage.

It is prohibited to use a general and uniform personal identification symbol that can be used without restriction. Personal data can be transferred, and different data processing can be linked, if the data subject has consented to it, or if the law allows it, and if the conditions for data processing are met for each individual piece of personal data.

Personal data may be transferred to a data controller or data processor in a third country if the data subject has expressly consented to it, or if it is permitted by law, and an adequate level of personal data protection is ensured during the handling and processing of the transferred data in the third country. Data transfer to the EEA states must be considered as data transfer within the territory of Hungary.

### 3. DATA CONTROLLER

In connection with this data management information, the Data Controller is Wagner Solar Hungária Kft. (hereinafter "Data Controller").

Information and contact details of the Data Controller:

- Name of data controller: Wagner Solar Hungária Kft.
- Address: 2120 Dunakeszi Fóti út 92.



- Company registration number: 13-09-09-1411
- Name of the registry court: Budapest District Court Company Registry
- Tax number: 12851607213
- Phone: +36 70 314 15 27
- Email: info@wagnersolar.hu

This data management information (hereinafter "Information") refers to the data processing carried out by the Data Controller, based on voluntary consent, for the purposes specified in this Information. For the purposes of this Information Data Subject: a natural person identified or identifiable on the basis of any information (hereinafter "Data Subject").

The range of stakeholders:

- Newsletter subscribers: Stakeholders requesting the newsletter service on the website [www.wagnersolar.hu](http://www.wagnersolar.hu) (hereinafter referred to as "Website").
- Bidders: Stakeholders requesting a bid from the Data Controller online on the Website or in person at one of the Data Controller's offices (hereinafter referred to as "Offline").
- Buyers, Clients, Partners: Data Subjects who use the Data Manager's services or purchase its products based on the contract concluded with the Data Manager.

#### 4. LEGAL BASIS FOR DATA MANAGEMENT

CXII of 2011 on the right to information self-determination and freedom of information. Act (hereinafter referred to as "Infotv"), Section 5 (1) point b) and Regulation 2016/679 of the European Parliament and Council (General Data Protection Regulation hereinafter referred to as "GDPR"), based on Article 6 (1) point a) Voluntary consent of the affected person.

If you consent to the processing of your personal data, the Data Controller will process them in accordance with the applicable Hungarian and European Union data protection rules. By providing the given personal data, you declare that you are familiar with the version of this information sheet in effect at the time the data is provided and that you have made your declaration of consent based on this.

#### 5. SOURCE OF DATA, PURPOSE OF DATA MANAGEMENT

Source of the data: The Data Subject makes the data available to the Data Controller with the voluntary consent of the Data Subject:

- Newsletter subscription when registering on the Website (hereinafter "Registration"),
- Case of the tenderer
- In the case of an offer requester, when submitting a request for an offer related to certain products of the Data Controller online or offline,





- In the case of Buyer, Client, or Partner, when the contract for the use of the service or the purchase of a product is concluded or created, Online or Offline.

The data management only covers the data that the Data Subject provides to the Data Controller when registering on the Website, or when changing the registration, or when requesting an offer or entering into a contract, and gives their consent to their processing in accordance with this Information.

The Data Subjects can give their consent to data management by deliberately ticking the empty checkbox on the Website, which is specifically designed for this purpose. By ticking the checkbox - on the basis of GDPR Article 6 (1) point a) and Article 7 - you consent to the Data Controller processing your personal data in accordance with the GDPR and the terms of this data management information. You acknowledge that, according to Article 7 (3) of the GDPR, you can withdraw your consent at any time, even with one click.

The purpose of data management:

- In the case of newsletter subscribers: for the purpose of identifying the newsletter subscriber, selling the Data Controller's services and products and acquiring customers, the Data Controller sends offers, newsletters, information about promotions, events and information to the e-mail address provided by the Data Subject and to other online forums,
- In the case of applicants: providing the Data Subject with an offer for the Data Controller's products and services,
- In the case of buyers, clients, partners: performance of the purchased product or service according to the contract, contact, accounting purposes: invoicing.

In the case of data recorded in the program when viewing the content pages of the Data Manager, the data is stored for statistical purposes only. The Data Controller does not use personal data for purposes other than those indicated. Personal data is transferred to third parties only with the user's prior and detailed consent based on exhaustive information. This does not apply to cases where legislation requires data transmission as an obligation for the Data Controller.

#### Google Analytics

The website uses Google Analytics.

When using Google Analytics:

On the basis of internal cookies, Google Analytics compiles a report for its customers on the habits of the users of the Website.

On behalf of the Website operator, Google uses the information to evaluate how users use the Website. As an additional service, it prepares reports related to the activity of the Website for the Website operator, so that it can provide additional services.



The data is stored on Google's servers in an encrypted format in order to make it difficult and prevent misuse of the data.

You can disable Google Analytics as follows. Quote from the site:

Website users who do not want Google Analytics JavaScript to report their data can install a Google Analytics opt-out browser extension. The plugin prevents Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sending information to Google Analytics. The browser extension can be used in most recent browsers. The Google Analytics blocking browser extension does not prevent data from being sent to the website itself and other internet analytics services.

<https://support.google.com/analytics/answer/6004245?hl=en>

Google's data protection guidelines: <https://policies.google.com/privacy?hl=hu>

Detailed information on the use and protection of data is available at the links above.

Data protection in detail:

[https://static.googleusercontent.com/media/www.google.com/en//intl/hu/policies/privacy/google\\_privacy\\_policy\\_hu.pdf](https://static.googleusercontent.com/media/www.google.com/en//intl/hu/policies/privacy/google_privacy_policy_hu.pdf)

Use of cookies on the Website

You can read more about the Cookies used on the Website in the "cookie settings" on the Website and in the information below:

[https://wagnersolar.hu/wp-content/uploads/2020/09/cookie\\_szabalyzat.pdf](https://wagnersolar.hu/wp-content/uploads/2020/09/cookie_szabalyzat.pdf)

You can read more about third-party cookies here

<https://www.google.com/policies/technologies/types/> , and about data protection here

<https://www.google.com/analytics/learn/privacy.html?hl=en>

## 6. SCOPE OF PROCESSED DATA

Scope of processed data According to stakeholders:

- For newsletter subscribers: Name (surname, first name) and email address provided by the newsletter subscriber.
- For bidders: surname, first name, email address, telephone number, mailing address, place of use and address of installation property.
- In the case of buyers, clients, partners: surname, first name, home address, mother's name, place of birth, time, tax identification number, email address, telephone number, mailing address, place of use and address of installation property.

## 7. PERIOD OF DATA MANAGEMENT



In the case of newsletter subscribers: data is processed until consent is withdrawn. You can withdraw your consent to data management at any time by sending an email to [marketing@wagnersolar.hu](mailto:marketing@wagnersolar.hu). Data is deleted when consent to data management is revoked.

In the case of bidders, buyers, clients, partners:

In the case of Online Data provided during registration on the Website, until the Data Subject cancels his/her Registration, which you can do at any time, as well as during data verification and data updating (annually), if the data has reached the goal.

In the case of data provided online and offline: usually one year, in the case of the implementation of larger systems, the warranty period after the conclusion of the contract, but a maximum of the period prescribed by the accounting law.

## 8. DATA STORAGE, DATA SECURITY

The Data Controller stores personal data in digital form on the server and with the help of company management systems. The managed data can only be accessed by the employees of the Data Controller who are authorized to do so among the employees participating in the performance of the services related to the managed data. In order to ensure the security of the data, the Data Controller applies at least the protection system standard in the profession and ensures that it is regularly updated and expanded, but also does everything that can be expected in the given situation in order to prevent unauthorized access to the processed data. The Data Controller's employees, agents and cooperating partners undertake to protect the data they come to know in the course of their work, and accept the related confidentiality obligation and compliance with the Data Controller's data management rules.

Actual data management location for data stored on paper: 2120 Dunakeszi Fóti út 92.

Automation of data management: machine, virus protection and multiple passwords on our own server.

## 9. DATA PROCESSOR

The Data Controller uses a data processor for data management.

The Data Controller uses the following data processors in order to provide high-quality service to the Data Subjects when handling the data:

NAME	ADDRESS	ACTIVITY
Györgyi Tamás EV.	2119 Pécel Bajcsy-Zsilinszky utca 22.	IT service



Websupport Magyarország Kft.	1132 Budapest, Victor Hugo utca 18-22.	domain service
SmartFront Kft.	1132 Budapest, Váci út 18.	database maintenance and processing, preparation of reports
Mailchimp (The Rocket Science Group, LLC)	675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA	newsletter
MiniCRM Zrt.	1075 Budapest, Madách Imre út 13-14.	newsletter
Penge Média Kft.	1139 Budapest, Teve utca 1. D. ép. 2. lház. 6. emelet 61.	remarketing

The data you provide is stored on the server operated by the hosting provider. Only the employees of the Data Controller and the employees operating the server can access the data, but they are all responsible for the safe handling of the data.

Name of the activity: hosting service.

The purpose of data management is to ensure the operation of the website.

The processed data: the personal data provided by the data subject.

Duration of data management and deadline for data deletion: Data management until the end of the operation of the website, or according to the contractual agreement between the operator of the website and the hosting provider. If necessary, the affected person can contact the hosting provider and request the deletion of their data.

The legal basis for data management is the consent of the person concerned, or data management based on legislation.

If we change the scope of our data processors, we will introduce the changes in this information.

## 10. DATA TRANSFER

Data may be forwarded to a third party with the consent of the data subject in order to achieve the purpose.

For newsletter subscribers: The Data Controller does not forward personal data to third parties.

In the case of bidders, buyers, clients, partners:

Personal data is provided to a third party by the data controller, e.g. freight forwarder, subcontractor, etc. it will be forwarded in the event that, based on the commission agreement





between him and the third party, the third party acts as an agent during the conclusion of the contract to be concluded with the Data Subject.

In the contract to be concluded with the Client, the third-party data controller undertakes to handle the personal data transmitted to it in accordance with legal requirements.

The purpose of data management is to ensure the operation of the website.

The processed data: the personal data provided by the data subject.

Duration of data management and deadline for data deletion: Data management until the end of the operation of the website, or according to the contractual agreement between the operator of the website and the hosting provider. If necessary, the affected person can contact the hosting provider and request the deletion of their data.

The legal basis for data management is the consent of the person concerned, or data management based on legislation.

If we change the scope of our data processors, we will introduce the changes in this information.

## 11. RIGHTS RELATED TO DATA MANAGEMENT

Affected rights: You about data management:

- you can request information before the start of data management (right to prior information) and also after the start of data management,
- you can request that the Data Controller make available to you the personal data of the data subject and the information related to their management,
- you can request the correction, modification, addition or restriction of personal data managed by the Data Controller,
- you can object to data processing and request the deletion and blocking of your data (with the exception of mandatory data processing),
- you can take legal action in court,
- you can file a complaint with the supervisory authority or initiate a procedure (<https://naih.hu/panaszuegyintezes-rendje.html>).

The right to prior information

At your request, we provide information before the start of the data processing operations carried out by us or our commissioned data processor, or immediately after the start of the first data processing operation at the latest:

- the name and contact details of the Data Controller - and, if a data processing operation is performed by a data processor, the data processor -
- the purpose of the planned data management,



- about the Data Subject's rights in relation to data management, as well as how to enforce them,
- on the legal basis of data management,
- on the duration of the retention of processed personal data, on the aspects of determining this duration,
- in the case of the transfer or planned transfer of processed personal data, the range of recipients of the data transfer, including recipients from third countries and international organizations,
- about the source of the collection of processed personal data,
- about all other relevant facts related to the circumstances of data management.

#### The right to request information

Upon your request, we provide information about the data you manage or process by us - or by our commissioned data processor

- about your data,
- about their source,
- the purpose and legal basis of data management,
- its duration, and if this is not possible, the criteria for determining this duration,
- about the name and address of our data processors and their activities related to data management,
- about the circumstances and effects of data protection incidents and the measures we have taken to prevent and eliminate them, and
- in the case of forwarding your personal data, about the legal basis and recipient of the data forwarding.

Upon your request, we will send information to the e-mail address you provided or in writing, immediately, but no later than 25 days from the date of submission to the Data Controller. This information is free of charge, however, if the requester submits a repeated request for information regarding the same data in the current year, and based on the repeated request, the data controller lawfully omitted to correct, delete or limit the processing of his personal data managed by the data controller or the commissioned data processor, the the data controller may demand reimbursement from the Data Subject for the costs directly incurred in connection with the repeated and unfounded request.

#### Right to rectification

You can ask us to correct any of your inaccurate personal data via the contact details provided. Considering the purpose of data management, you are entitled to request the addition of incomplete



personal data. We will act on your request immediately, but no later than 25 days from the date of submission of the request, by sending information to the e-mail contact you provided or in writing.

#### The right to erasure

You can ask us to delete your data via the contact details provided. At your request, we will do this immediately, but no later than 25 days from the date of submission of the request, by sending information to the e-mail contact you provided or in writing.

The data manager deletes the personal data if its processing is illegal, the data subject requests it, the purpose of the data management has ceased, or the statutory period for storing the data has expired, it was ordered by the court or the data protection commissioner.

#### Right to block

You can ask us to block your data via the contact details provided. The blocking lasts as long as the reason indicated by you makes it necessary to store the data. At your request, we will do this immediately, but no later than 25 days from the date of submission of the request, by sending information to the e-mail contact you provided or in writing.

The Data Controller will notify you and all those to whom the data was previously forwarded for the purpose of data management regarding the correction, blocking, marking and deletion of personal data, unless the failure to notify does not harm your legitimate interests.

If we do not comply with your request for correction, blocking or deletion, within no more than 25 days after receiving the request, we will communicate the reasons for our refusal in writing or - with your consent - electronically and inform you about the possibility of legal remedies in court, as well as the possibility of turning to the Authority.

#### The right to protest

If you object to the processing of your personal data, we will examine the objection as soon as possible, but no later than 25 days after the submission of the request, and inform you of our decision in writing. If we have decided that your protest is well-founded, in that case we will terminate the data management - including further data collection and transmission - and block the data, as well as notify all those to whom the personal data affected by the protest have been notified of the protest and the measures taken based on it. previously forwarded, and who are obliged to take action to enforce the right to protest.

We will refuse to comply with the request if we prove that the data processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the submission, enforcement or defence of legal claims.

#### Right to data portability

You have the right to receive the personal data concerning you that you have provided to the Data Controller in a segmented, widely used, machine-readable format, and you are also entitled to



transfer this data to another data controller without being hindered by the data controller whose made the personal data available to you.

The possibility of legal enforcement related to data management

In case of illegal data processing that you have experienced, notify the Data Controller, so that it is possible to restore the legal status within a short period of time. In your interest, we will do everything we can to resolve the outlined problem.

If, in your opinion, the legal situation cannot be restored, you can file a complaint or initiate a procedure with the following authority:

National Data Protection and Freedom of Information Authority

Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c Phone: +36 (1) 391-1400 Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <https://naih.hu>

You may go to court against the data controller or – in connection with the data processing operations within the scope of the data processor's activities – the data processor, if, in your opinion, the data controller or the data processor entrusted by him or acting on the basis of his instructions has provided your personal data in accordance with the legislation on the management of personal data or the European Union treats it in violation of the regulations specified in its legal act. Adjudication of data protection lawsuits falls under the jurisdiction of the court, the lawsuit can be initiated - at the choice of the data subject - before the court of the residence or place of residence of the data subject.

We ask that you contact the Data Controller before contacting the supervisory authority or the court with your complaint - in order to negotiate and resolve the problem as quickly as possible.

## 12. MODIFICATION OF DATA MANAGEMENT INFORMATION

The Data Controller reserves the right to amend this Data Management Information, which amendments shall enter into force upon publication on the Website.

## 13. APPLICABLE LAWS

The data controller undertakes to ensure that its activities in this direction are valid at all times performed according to legislation. At the time of publication of this document, they are:

- CVIII of 2001 Act on certain issues of electronic commercial services and services related to the information society (hereinafter: Electronic Commercial Act).
- XLVIII of 2008 Act on the Basic Conditions and Certain Limitations of Economic Advertising (hereinafter: Economic Advertising Act).



- CXII of 2011. Act on the right to self-determination of information and freedom of information.
- Regulation EU 2016/679 on the management of personal and data for natural persons regarding its protection and the free flow of such data (GDPR)

