

## Data management and privacy notice

### Introduction

This Privacy and Data Protection Policy describes how we we handle your personal data, regardless of whether you are our customer, supplier, or "just" browsing our website. It explains how we we collect and use your personal data and how comply with our legal obligations.

This Privacy and Data Protection Policy is for visitors to our website, our suppliers and customers.

This notice does not apply to websites, service providers services and processing of data by the providers and services covered by the websites to which this notice applies. Such services are referred to in the third-party service providers in their privacy notices for which the **City Raktár Üzemeltető Kft.** and **Belvárosi Raktárkezelő Kft.** as data controller does not take any responsibility.

Please read this information carefully to understand how we process your personal data, so you understand your rights in relation to data processing. Please also note that our privacy policy may be amended from time to time. If you would like to be updated, please visit this page as any changes will be posted here.

The publisher of this information is also the data controller:

Company name: **City Raktár Üzemeltető Kft.**

Company registration number: 01-09-394448

Tax number: 27552407-2-42

Managing Director: Molnárné Szandai Edit

E-mail address: [info@citystorage.hu](mailto:info@citystorage.hu)

Website: [www.citystorage.hu](http://www.citystorage.hu)

(hereinafter referred to as **City Storage**)

Data Protection Officer: based on the European Parliament and Council 2016/679 Regulation (EU) No/676/2003 (hereinafter referred to as "**GDPR**") Article 37 we are not obliged to appoint a Data Protection Officer.

Data Protection Requests: if you have any requests or questions regarding your data protection you can send your request by post or electronically to the address or e-mail address indicated above. We will reply to you without delay, but within a maximum of 30 (thirty) days, to the address you have provided.

Processing of data: we use a data processor who provides IT services (hosting) for the maintenance and management of City Storage website to maintain the storage of your data for the purposes of the website and, for the duration of our contract with them, to provide you with a service provider. The personal data provided on the website will be stored on the server.

Abroad data transfers: we want to ensure that your data is stored and transferred securely. Therefore, we will only transfer data outside the European Economic Area (EEA) (European Union Member States plus Norway, Iceland and Liechtenstein) if it complies with data protection legislation and the transfer method ensures that your data is adequately protected.



## **General data processing purposes**

We process data in accordance with the legal provisions for the following purposes:

1. to provide City Storage services to our customers, providing services to our customers in connection with our legal and contractual obligations
2. We provide services to our customers for the fulfilment of our legal and contractual obligations and to maintain relationship with our customers.
3. our suppliers' data for the purposes of cooperating with them and fulfilling our legal and contractual obligations and commitments.
4. to process data of our partners' contact details.
5. marketing activity to our potential customers.
6. processing data of our employees and applicants.
7. internal administration.

## **What personal data do we collect?**

Processing data of our contractual partners - registering customers and suppliers:

City Storage processes the name, name at birth, date of birth, mother's name, address, identity card number, address of the registered office and place of business, telephone number, e-mail address and bank account number of the natural person who has contracted with it as a client, customer and/or supplier for the purposes of the conclusion, performance, termination of the contract and for the purposes of maintaining contact. Such processing is also lawful if it is necessary for the purposes of taking steps at the request of the data subject prior to the conclusion of the contract.

Legal basis: processing based on legitimate interest.

Recipients of personal data: employees of City Storage performing customer service tasks, employees performing accounting and tax tasks, and data processors.

Duration of storage of personal data: 5 (five) years after termination of the contract.

Contact details of natural person representatives and contact persons of customers, suppliers of legal persons: the protection of data of legal persons is not covered by data protection rules as a rule. However, there are cases where the transactions of legal persons involve personal data of natural persons. One of the existing cases is the processing of personal data of the contact person indicated in the contract. In the case of our legal person customers and suppliers, we collect the following data of the contact persons indicated in the contract or subsequently: Name, position, phone number, e-mail address, online identifier.

Legal basis: consent of the person of interest

Purpose of the processing of personal data: performance of a contract with a legal entity partner of City Storage and business relations.

Recipients of personal data: employees of City Storage performing customer service-related tasks.

Duration of storage of personal data: for 5 (five) years after the business relationship or the data subject's capacity as a representative has been established.

Purpose of processing personal data: sending newsletters on case studies and City Storage services, sending advertising material.

Legal basis for processing: consent of the data subject.

**Recipients of personal data:**

City Storage's employees performing tasks related to customer service and marketing activities, and the Company's IT service provider as a data processor for the purpose of providing the hosting service.

Duration of the storage of personal data: until the newsletter service is provided or until the data subject's consent is withdrawn (request for deletion).

**Website user data:**

We collect a limited amount of information about visitors to City Storage's websites to help us improve user experience and to help us administer the services we provide. This includes information such as how our website is used, how often our website is visited and the times when our website is most popular.

**Cookie information:**

A "cookie" is a piece of information that your computer stores on your hard drive that keeps track of your navigation of a website so that when you visit that site again, it can display personalized options based on the information stored about your last visit. Cookies can also be used for traffic analysis, advertising and marketing purposes. Almost all websites use cookies, but they are not harmful to your system. If you want to control or change the type of cookies you accept, you can usually do this in your browser settings.

We use cookies to track how you use our website. This helps us to develop and improve our website and services based on the needs and requirements of our visitors.

**The data processed during the visit:**

- the IP address used by the visitor,
- the browser type,
- specifications of the operating system of the device used for browsing,
- time of visit,
- the (sub)page, function or service visited.
- click.

The above data will be retained for a maximum of 90 (ninety) days and may be used primarily to investigate security incidents.

**Cookies used on our website:**

Technically necessary session cookies

Purpose of processing: to ensure the proper functioning of the website. These cookies are necessary to allow visitors to browse the website, to use its functions smoothly and fully, to use the services available through the website, including, in particular, to note the actions carried out by the visitor on the pages concerned or to identify the logged-in user during a visit. The duration of the processing of these cookies is limited to the current visit of the visitor, and this type of cookie is automatically deleted from his/her computer at the end of the session or when the browser is closed.

Legal basis: Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services, according to which the service provider may process personal data that are technically necessary for the provision of the service.

**Cookies to facilitate use:**

these cookies remember the user's choices, for example, in what form the user would like to see our site. These types of cookies essentially mean the preferences of the data stored in the cookie.

Legal basis: consent of visitor.

Purpose of processing: to improve the efficiency of the service, to enhance the user experience and to make our website more convenient to use. This data is stored on the visitor's computer, the website only accesses and recognises the visitor.

**Performance cookies:**

these cookies collect information about the user's behaviour at the time of visit, duration of time spent on our website and clicks. These are typically third-party applications (e.g. Google Analytics, AdWords).

Legal basis: consent of the person.

Purpose of data handling: to analyse the website, to send advertising offers.

Please find below the link to the cookies we use, the purpose of their use and the types of cookies used.

**How we collect your personal data:**

We collect personal information in two main ways:

- personal data that you provide to us directly;
- personal data that we collect automatically: your data is automatically collected by cookies when you visit our website, according to your browser's cookie settings.

We also collect data from you when you contact us through the website, for example by using the chat function.

**Who do we share your personal information with?**

We may share your personal data with the following categories of persons for different reasons and in different ways:

- with public authorities if we reason to believe that we are required by law or regulation to share the information (e.g., because of a request from tax authorities or an anticipated dispute);
- with third party service providers who perform services on our behalf (including external consultants, business partners and advisers such as lawyers, accountants and auditors, technical support functions and IT consultants);
- third-party outsourced IT service providers and document storage service providers where an appropriate management agreement (or similar) is in place;
- marketing technology platforms.

**How we protect your personal data?**

We are committed to taking all reasonable and necessary steps to protect the personal information we hold from misuse, loss or unauthorised access. We guarantee this through a number of necessary technical and organisational measures. These include measures to address potential breaches of data security. If you suspect misuse, loss or unauthorised access to your personal information, please let us know immediately.

## Rights of persons involved

One of the main aims of the GDPR is to protect and clarify the data protection rights of EU citizens in the EU. This means that you retain certain rights in relation to your data, even if you have given us the information. These are explained in more detail below.

A brief summary of your rights:

- Transparent information, communication and facilitation of the exercise of the data subject's rights
- Right to prior information - where personal data are collected from the data subject
- Information to the data subject and the information to be provided to him or her where the personal data have not been obtained by the controller from him or her
- Right of access of the data subject
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Obligation to give notice in relation to rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Automated decision-making in individual cases, including profiling
- Restrictions
- Informing the data subject of a personal data breach
- Right to lodge a complaint with a supervisory authority (right to official redress)
- Right to an effective judicial remedy against the supervisory authority
- Right to an effective judicial remedy against the controller or processor

## Details of the data subject's rights

1 Transparent information, communication and facilitation of the exercise of the data subject's rights

1.1 The controller shall provide the data subject with all information and any particulars relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language, in particular in the case of any information addressed to children. The information shall be provided in writing or by other means, including, where appropriate, by electronic means. At the request of the data subject, information may be provided orally, provided that the identity of the data subject has been verified by other means. The controller shall facilitate the exercise of the rights of the data subject.

1.2 The controller shall, without undue delay and in any event within one month of receipt of the request, inform the data subject of the measures taken in response to his or her request to exercise his or her rights. This time limit may be extended by a further 2 (two) months under the conditions laid down in the GDPR, of which the data subject shall be informed.

1.3 If the controller fails to act on the data subject's request, the controller shall inform the data subject without delay, but no later than 1 (one) month after receipt of the request, of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right to judicial remedy.

1.4 The controller shall provide information and the information and action on the rights of the data subject free of charge but may charge a fee in the cases provided for in the GDPR.

The detailed rules are set out in Article 12 of the GDPR.

2 Right to prior information - where personal data are collected from the data subject.

2.1 The data subject has the right to be informed of the facts and information relating to the processing before the processing starts. In this context, the data subject shall be informed:

1 a) the identity and contact details of the controller and its representative,

2 b) the contact details of the Data Protection Officer (if any),

3 c) the purposes for which the personal data are intended to be processed and the legal basis for the processing,

2 (d) in the case of processing based on legitimate interests, the legitimate interests of the controller or third parties,

3 e) the recipients of the personal data to whom the personal data are disclosed and the categories of recipients, if there is any;

4 e) where applicable, the fact that the controller intends to transfer the personal data to a third country or an international organisation.

5 e) whether the provision of the personal data is based on a legal or contractual obligation or is a prerequisite for the conclusion of a contract, and whether the data subject is under an obligation to provide the personal data and the possible consequences of not providing the data;

2.3 If the controller intends to further process personal data for a purpose other than that for which they were collected, the controller must inform the data subject of that other purpose and of any relevant additional information before further processing.

The detailed rules are set out in Article 13 of the GDPR.

3 Information to be provided to and by the data subject where the controller has not obtained the personal data from him or her.

3.1 If the controller has not obtained the personal data from the data subject, the data subject shall be informed by the controller no later than one month after the personal data have been obtained; if the personal data are used for the purpose of contacting the data subject, at least at the time of the first contact with the data subject; or, if the data are likely to be disclosed to another addressee, no later than the time of the first disclosure of the personal data, in accordance with the provisions of paragraph 2. the facts and information referred to in point (2), the categories of personal data concerned and the source of the personal data and, where applicable, whether the data originate from publicly available sources.

3.2 The additional rules set out in point 2 above (right to prior information) shall apply.

The detailed rules are set out in Article 14 of the GDPR.

4 Right of access of data subject

4.1 The data subject shall have the right to obtain feedback from the controller as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to access the personal data and related information described in points 2-3 above.

4.2 If personal data are transferred to a third country or an international organisation, the data subject is entitled to be informed of the appropriate safeguards for the transfer in accordance with Article 46 GDPR.

4.3 The controller must provide the data subject with a copy of the personal data which are the subject of the processing. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

The detailed rules are set out in Article 15 of the GDPR.

## 5 The right to rectification

5.1 The data subject shall have the right to obtain from the Data Controller, upon his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her.

5.2 Taking into account the purpose of the processing, the data subject shall also have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

The detailed rules are set out in Article 16 of the GDPR.

## 6 Right to erasure ("right to be forgotten")

6.1 The data subject shall have the right to obtain from the controller, upon his or her request, the erasure of personal data relating to him or her without undue delay and the controller shall be obliged to erase personal data relating to him or her without undue delay where

1 a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

2 b) the data subject withdraws the consent on the basis of which the processing was carried out and there is no other legal basis for the processing;

3 c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing,

4 d) the personal data have been unlawfully processed;

5 e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;

6 f) the personal data were collected in connection with the provision of information society services directly to a child.

6.2 The right to erasure may not be exercised if the processing is necessary

1 a) for the exercise of the right to freedom of expression and information;

2 b) to comply with an obligation under Union or Member State law to which the controller is subject or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller;

3 c) on grounds of public interest in the field of public health;

4 (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right of erasure would be likely to render such processing impossible or seriously jeopardise it; or

5 e) for the establishment, exercise or defence of legal claims.

The detailed rules are set out in Article 17 of the GDPR.

## 7 Right to restriction of processing

7.1 Where processing is restricted, such personal data, except for storage, may only be processed with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

7.2 The data subject shall have the right to obtain, at his or her request, the restriction of processing by the Controller if one of the following conditions is met:

1 (a) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the Controller to verify the accuracy of the personal data;

2 b) the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;



3 c) the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or  
4 d) the data subject has objected to the processing; in this case, the restriction shall apply for a period of time until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject.

7.3 The data subject shall be informed in advance of the lifting of the restriction.

The detailed rules are set out in Article 18 of the GDPR.

8 Obligation to notify the rectification or erasure of personal data or restriction of processing  
The controller shall inform all recipients of any rectification, erasure or restriction of processing to whom or with which the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of these recipients.

The detailed rules are set out in Article 19 of the GDPR.

9 The right to data portability

9.1 Subject to the conditions set out in the Regulation, the data subject has the right to receive personal data relating to him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format and the right to transmit those data to another controller without hindrance from the controller to whom the personal data have been provided, if.

1 a) the processing is based on consent or on a contract; and

2 b) the processing is carried out by automated means.

9.2 The data subject may also request the direct transfer of personal data between controllers.

9.3 The exercise of the right to data portability shall not infringe Article 17 of the GDPR (Right to erasure ("right to be forgotten")). The right to data portability shall not apply where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This right shall not adversely affect the rights and freedoms of others.

The detailed rules are set out in Article 20 of the GDPR.

10 The right to decline

10.1 The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data based on the public interest, the performance of a public task or a legitimate interest, including profiling based on the aforementioned provisions. In such a case, the controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

10.2 Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

10.3 These rights must be explicitly drawn to the attention of the data subject at the latest at the time of the first contact with the data subject and the information must be clearly displayed separately from any other information.

10.4 The data subject may exercise the right to object by automated means based on technical specifications.

10.5 Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

11 Automated decision-making in individual cases, including profiling

11.1 The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

11.2 This right does not apply where the decision:

1 a) necessary for the conclusion or performance of a contract between the data subject and the controller;

2 b) it is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or

3 (c) based on the explicit consent of the data subject.

11.3 In the cases referred to in points (a) and (c) above, the controller shall take appropriate measures to safeguard the rights, freedoms and legitimate interests of the data subject, including at least the right to obtain human intervention by the controller, to express his or her point of view and to object to the decision.

The detailed rules are set out in Article 22 of the GDPR.

12 Restrictions

EU or Member State law applicable to a controller or processor may limit the scope of rights and obligations (Articles 12-22, 34, 5 of the Regulation) by legislative measures if the limitation respects the essential content of fundamental rights and freedoms.

The detailed rules are set out in Article 23 GDPR.

13 Informing the data subject of the personal data breach

13.1 Where a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller must inform the data subject of the personal data breach without undue delay. This information shall clearly and plainly describe the nature of the personal data breach and shall include at least the following:

1 a) the name and contact details of the Data Protection Officer or other contact person who can provide further information;

2 c) a description of the likely consequences of the data breach;

3 (d) a description of the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

13.2 The data subject need not be informed if any of the following conditions are met:

1 (a) the controller has implemented appropriate technical and organisational protection measures and these measures have been applied to the data affected by the personal data breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;

2 b) the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise;

3 c) the information would require a disproportionate effort. In such cases, the data subjects shall be informed by means of publicly disclosed information or by means of a similar

measure which ensures that the data subjects are informed in an equally effective manner. The detailed rules are set out in Article 34 of the GDPR.

#### 14 Right to lodge a complaint with a supervisory authority (right of administrative remedy)

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes the Regulation. The supervisory authority with which the complaint has been lodged must inform the data subject of the procedural developments concerning the complaint and of the outcome of the complaint, including the right of the data subject to judicial remedy.

The detailed rules are set out in Article 77 of the GDPR.

#### 15 Right to an effective judicial remedy against the supervisory authority

15.1 Without prejudice to any other administrative or non-judicial remedy, any natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning him or her.

15.2 Without prejudice to any other administrative or non-judicial remedy, any data subject shall have the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments concerning the complaint lodged or of the outcome of the complaint.

15.3 Proceedings against a supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

15.4 If proceedings are brought against a decision of the supervisory authority on which the Board has previously issued an opinion or taken a decision under the consistency mechanism, the supervisory authority shall be required to transmit that opinion or decision to the court.

The detailed rules are set out in Article 78 of the GDPR.

#### 16 Right to an effective judicial remedy against the controller or processor

16.1 Without prejudice to any available administrative or non-judicial remedies, including the right to lodge a complaint with a supervisory authority, every data subject shall have the right to an effective judicial remedy if he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data not in accordance with this Regulation.

16.2 Proceedings against a controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. Such proceedings may also be brought before the courts of the Member State in which the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in its exercise of official authority.

The detailed rules are set out in Article 79 of the GDPR.

#### Information on legal remedies

In Hungary, the data protection supervisory authority:

National Authority for Data Protection and Freedom of Information

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

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

The data protection court is located at: 11.16.1.2008. A lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's choice.

Budapest, 8 June 2022.