OMIKRON Informatics Ltd.
Olympia Irodaház, Hungária körút 30/A, 8th floor, Budapest, 1087 Hungary
10 Török Bálint utca, Debrecen 4025 Hungary
P.O. Box 173, Budapest, 1431 Hungary
Phone: +36 1 3137855
E-mail: info@omikron.hu
Website: www.omikron.hu/en

DATA PRIVACY NOTICE

website contact data management

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TABLE OF CONTENTS

1. Introduction **2**
2. Data controller and data processed **2**
2.1. Data processors 2
3. Who you can contact **2**
4. Lawfulness and purpose of processing data **3**
5. Personal data recipients **3**
6. How long we store the processed data **3**
7. Where we store the processed data **3**
8. Your rights in relation to data processing **4**
8.1. Right to be informed and right of access 4
8.2. Right to rectification 5
8.3. Right to erasure 5
8.4. Right to restrict processing data 5
8.5. Right to object 6
8.6. Right to data portability 6
8.7. Right to withdraw consent 7
8.8. Right to automated decision-making 7
9. Steps to take in case of infringement **7**

1. Introduction

We collect and manage personal data in accordance with applicable laws and regulatory requirements and store them in the safest way possible.

Personal data may only be transferred to third parties with your consent except when requested by an authority.

We will provide anyone with information about the data stored about them if requested in writing by contacting us at
adatvedelem@omikron.hu

You can request your data to be deleted at this address:
adatvedelem@omikron.hu

2. Data controller and data processed

OMIKRON Informatika Kft. (Olympia Irodaház, Hungária körút 30/A, 8th floor, Budapest, 1087 Hungary, company registration number: 01-09-864341, VAT number: 3613121-2-42, website address: omikron.hu – hereinafter: OMIKRON) processes the following personal data as described in this Data Privacy Notice:

- name
- telephone number
- e-mail address
- other contact data provided

2.1. DATA PROCESSORS

According to Article 28 GDPR, OMIKRON only employs such data processors who can ensure compliance with the regulatory requirements and the implementation of technical and organizational measures in order to protect the rights of data subjects.

Those who have access to personal data will only process them according to the instructions of the data controller unless they are required to do otherwise by European Union or Member State Law.

3. Who you can contact

OMIKRON has appointed a Data Protection Officer whom you can contact at the following contact information regarding any data management issues:

Andrea Valacsay
Telephone number: +36 1 313 7853
Email: adatvedelem@omikron.hu

4. Lawfulness and purpose of processing data

The legal basis for OMIKRON's processing of the data in the title:

Name:	Consent (GDPR Article 6(1)(a))
E-mail:	Consent (GDPR Article 6(1)(a))
Telephone number:	Consent (GDPR Article 6(1)(a))
Other contact data provided:	Consent (GDPR Article 6(1)(a))

Purpose of processing data: fulfilling the contact purpose of the data subject and maintaining contact.

5. Personal data recipients

Data may be accessed by employees and data processors of the data controller.

6. How long we store the processed data

The retention period of the processed data equals the duration of the communications.

7. Where we store the processed data

Data will be stored in the following sytem(s):

- **Information technology system:** The IT system consists of several subsystems that cooperate with each other. Availability is ensured by multi-level redundancy.
- **Mailing system:** The mailing system is the system of a leading manufacturer. The data controller updates the software regularly. All mail is subject to spam filtering as well as anti-virus scanning. Mail can be accessed by only authorized persons. Availability is ensured by a redundant system design.

- **File server / saving data:** The server runs on an up-to-date operation system, access is regulated by a strict system of permissions, documents containing personal data are stored in an encrypted form.
- **Contact system:** Access is restricted with password protection.

8. Your rights in relation to data processing

You can exercise your rights to data processing in the following ways. OMIKRON may request the information necessary to confirm your identity in order to ensure that the rights and freedoms of third parties are not infringed.

- contact the Data Protection Officer in person (at an appointment previously agreed upon) at the following address: Olympia Irodaház, Hungária körút 30/A, 8th floor, Budapest, 1087 Hungary
- send an email to the Data Protection Officer at adatvedelem@omikron.hu;
- contact the Data Protection Officer at the following telephone number: +36 1 313 7853;

In relation to data processing, you have the following rights:

8.1. RIGHT TO BE INFORMED AND RIGHT OF ACCESS

OMIKRON will inform you about how your personal data are processed.

If OMIKRON processes your personal data, you may request access to the following:

- contact information of data controller and if applicable, their representative;
- if applicable, contact information of the Data Protection Officer;
- purpose(s) of processing data;
- lawfulness of processing data;
- processed personal data;
- personal data recipients or their categories;
- if applicable, particular recipients in third countries or International organizations and information about appropriate safeguards;
- the retention period or, if that is not possible, the criteria used to determine the retention period;
- your rights in relation to your personal data;
- your right to withdraw consent;
- if applicable, the right to automated decision-making, including profiling and their significance and consequences;
- your right to raise concern with the National Authority for Data Protection and Freedom of Information.

OMIKRON may provide you with a copy of your processed personal data in a way that it may not adversely affect the rights and freedoms of others. OMIKRON may charge you for additional copies and may refuse to comply with unfounded, excessive or repetitive requests.

8.2. RIGHT TO RECTIFICATION

You have the right to have OMIKRON rectify your inaccurate data and/or have your incomplete personal data completed without undue delay. As part of the process, the veracity of the data to be modified may be checked.

Your right to rectification does not extend to having OMIKRON modify surveillance footage, but it does extend to having OMIKRON rectify the record of the review or release of the surveillance footage, in case it contains inaccurate and/or incomplete information.

8.3. RIGHT TO ERASURE

You have the right to have OMIKRON erase your personal data without undue delay. OMIKRON Will not erase your personal data in case processing the data is necessary for:

- exercising the right of freedom of expression and information,
- complying with a legal obligation of processing personal data, the performance of a task carried out in the public interest or in the exercise of official authority by OMIKRON,
- reasons of public interest in the area of public health,
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes (in case the right to be forgotten would probably make processing this data impossible or severely endanger it),
- the establishment, exercise or defence of legal claims.

In other cases OMIKRON will erase your personal data without undue delay in case...

- OMIKRON will not need your personal data in relation to the purpose for which they were collected or processed,
- you object to the processing on grounds relating to your particular situation and there is no overriding legitimate grounds for continuing the processing,
- your personal data have been unlawfully processed,
- OMIKRON as well as its data processor are obliged to erase your personal data to comply with a legal obligation.

8.4. RIGHT TO RESTRICT PROCESSING DATA

You have the right to have OMIKRON restrict processing your data. Where processing your data is restricted, with the exception of storage, OMIKRON as well as its data processor may

process them only with your consent 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 reasons of important public interest of the European Union or of a Member State.

You may ask for the restriction of data processing in case...

- you contest the accuracy of your data,
- processing the data is unlawful, you object to having your information erased,
- OMIKRON as well as its data processor do not need your personal data for data processing purposes, but you request the restriction of processing your personal data for the establishment, exercise or defence of legal claims,
- you object to the processing on grounds relating to your particular situation.

Where you have obtained restriction of processing of your data, OMIKRON will inform you before lifing the restriction.

8.5. RIGHT TO OBJECT

You have the right to object to processing your personal data in the exercise of official authority or for legitimate interests, including profiling carried out for these two purposes. In this case, OMIKRON will no longer be allowed to process your personal data, except if there are such compelling legitimate reasons to continue processing your data that take priority over the interests, rights and freedoms of the parties involved or which relate to the establishment, exercise or defence of legal claims.

In case the processing of personal data relates to direct marketing, you have the right to object to the data processing as well as profiling you. Your personal data will no longer be processed for this purpose following your objection.

8.6. RIGHT TO DATA PORTABILITY

You have the right to have OMIKRON provide you with your personal data in structured, commonly used and machine-readable form. You also have the right to have your data transmitted to another data controller, in case...

- the data processing is based on consent or on a contract; and
- the data processing is carried out by automated means.

Under this right, you can require the data controller to have your data directly transmitted if such transmission is technically feasible.

The right to data portability does not apply in case...

- the data processing occurs in the performance of a task carried out in the public interest or in the exercise of official authority by OMIKRON;

- it would adversely affect the rights and freedoms of others.

8.7. RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent to the processing just as simply as you have given it to OMIKRON previously. Withdrawing consent does not affect the lawfulness of data processing prior to the withdrawal.

8.8. RIGHT TO AUTOMATED DECISION-MAKING

You have the right not to be subject to a decision solely based on automated processing – including profiling – which would have legal effects or would affect you similarly to a significant extent.

This cannot be applied in case...

- the decision may be made under European Union or Member State law applicable to OMIKRON;
- the data processing is necessary for the conclusion or performance of a contract between you and OMIKRON;
- you have given your express consent to the data processing.

In the last two cases you have the right to obtain human intervention, to present your point of view and to challenge the decision.

9. Steps to take in case of infringement

In case you believe that your data protection rights are infringed during the data processing, contact us at the following email address or by calling the following telephone number:

Andrea Valacsay
Telephone number: +36 1 313 7853
Email: adatvedelem@omikron.hu

In the case of the infringement of your rights concerning your personal data, you are entitled to lodge a complaint with the supervisory authority at the following contact details:

National Authority for Data Protection and Freedom of Information
Postal address: 1363 Budapest, Pf. 9.
Address: 1055 Budapest, Falk Miksa utca 9-11.
Telephone number: +36 1 391 1400
Fax: +36 1 391 1410
E-mail: ugyfelszolgalat@naih.hu

In the case of a breach in processing your personal data and/or the refusal of your objection, you may contact the tribunal competent for your habitual residence or the seat of the data controller.

In this case, the competent tribunal will proceed out of turn.

You can obtain further information concerning the legal procedure at the website of www.birosag.hu/en.

The release date of this version of the information is: August 24, 2026.