



PRIVACY NOTICE



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1. INTRODUCTION

GROHE HUNGARY Kereskedelmi Korlátolt Felelősségű Társaság, as controller (hereinafter: „Controller” or „Company”) wishes to provide you information on the processing of personal data of natural persons by this document (thereinafter: “Privacy Notice”). This Privacy Notice shall be governed primarily by the below legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR)
- Act CXII of 2011 on information self-determination and freedom of information (Infotv.)

Please read this document carefully and contact our colleague if you have any questions.

2. WHO MANAGES YOUR DATA?

Name: **GROHE HUNGARY Kereskedelmi Korlátolt Felelősségű Társaság**

Registered address: 1031 Budapest, Záhony utca 7. ("A" épület, II. emelet)

Tax registration number: 12481675-2-41

Company registration number: 01-09-882282

Represented by: Sándor Brankovics, Natalia Weronika Furmanczyk, Dr. Thomas Schachner, Persson Brennwald Per Olof Jonas managing directors

Phone: +36 1 238 80 45, 80 46

Email: info-HU@grohe.com

Data Protection Officer: DataProtection_HU@grohe.com

3. OUR PRINCIPLES

Personal data may be processed only for specified and explicit purposes, exercising of certain rights and fulfilment of obligations. The purpose of processing must be satisfied in all stages of data processing operations; recording of personal data shall be done under the principle of lawfulness and fairness („lawfulness, fair procedure and transparency”).



The personal data processed must be essential for the purpose for which it was recorded, and it must be suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose („*purpose limitation*”).

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed („*data minimisation*”).

The accuracy and completeness, and - if deemed necessary in the light of the aim of processing - the up-to-dateness of the data must be provided for throughout the processing operation, and shall be kept in a way to permit identification of the data subject for no longer than is necessary for the purposes for which the data were recorded („*accuracy*”).

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data shall preserve its personal character until connection thereof with the data subject may be restored. Connection may be restored with the data subject if the controller has the technical conditions necessary for the restoration. („*storage limitation*”).

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures („*integrity and confidentiality*”).

The Controller shall be responsible for, and be able to demonstrate compliance with the above principles („*accountability*”).

4. DEFINITIONS

„*data subject*” means natural person identified or identifiable by any information;

„*personal data*” means any information relating to the data subject;;

„*consent of the data subject*” means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

„*controller*” means the natural or legal person, and the organization without legal personality which - within the framework determined by Act or legally binding act of the European Union - alone or jointly with others, determines the purposes and means of the processing of personal data, makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor;

„*data processing*” means any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well



as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans;

„*data transfer*” means ensuring access to the data for a third party;

„*data process*” means overall data processing operation performed by the data processor on behalf of or by the will of the controller;

„*processor*” means the natural or legal person, or organization without legal personality which - within the framework and with the conditions determined by Act or legally binding act of the European Union - performs data processing operation on behalf of or by the will of the controller;

„*third party*” means the natural or legal person, or organisation without legal personality other the data subject, controller, processor and persons who, under the direct authority of the controller or processor process personal data;

„*personal data breach*” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure, publication of, or access to, personal data transmitted, stored or otherwise processed;

„*profiling*” means any form of automated processing of personal data consisting of the use of personal data to evaluate, analyse or predict personal aspects relating to a natural person, in particular aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

„*recipient*” means a natural or legal person, or organisation without legal personality to which the personal data are made accessible by the controller or the processor.

5. HOW DO WE MANAGE YOUR PERSONAL DATA?

The scope of the processed personal data:	Name, E-mail address, Telephone number, Address
The purpose of the data processing:	Enforcement of claims and rights Identification Communication
The legal basis of the data processing:	Legitimate interest (GDPR Article 6. (1) b), c) and f))
Data retention period:	The data retention period in relation to enforcement of civil claim or fulfilment of obligation, on the basis of subsection (1) section 6:22 of the Ptk., shall be 5 years as of the



	<p>termination of the civil relationship established with the data subject.</p> <p>If the Controller, on the basis of sections 168-169 of Act C of 2000 on Accounting, shall be obliged to retain the data, such data shall be erased 8 years after the termination of the contractual relation.</p>
Addressee (if any):	
Transfers of personal data to third countries or international organisations (if any):	

6. RECIPIENTS, DATA PROCESSING

In addition to the contracted data processors, only the employees of the Controller who are absolutely necessary for the performance of their duties have the right to get acquainted with the personal data. The contracted processor shall carry out the data processing in accordance with the instructions of the Controller, it shall not make a decision on the substance of the data processing, it shall process the personal data it has been granted access to only in accordance with the instructions of the Controller, it shall not carry out data processing for its own purpose, and the personal data shall be stored, kept and kept confidential by the processor in accordance with the instructions of the Controller. The processor shall not make use of additional processor without the prior written authorization of the Controller granted on a general or case by case basis.

7. SAFETY MEASURES, AUTOMATED DECISION MAKING

In accordance with Article 13 subsection (2) paragraph f) of GDPR we inform you that automated decision making does not carried out in within the processing of data made by the Controller.

The Controller ensures the security of the data in proportion with the risks and makes the technical and organizational measures and creates procedural rules that are necessary to enforce the regulation of the GDPR, the Infotv. and other regulations on the protection of data and privacy. The Controller protects the data in proportion with the risks in particular against unauthorized access, alteration, transfer, publication, deletion or destruction, accidental destruction and loss and against inaccessibility from the change of applied technique. The Controller, in proportion with the risks, protects the electronically processed data with firewalls, antivirus programs, encryption mechanisms, content filter and other technical and process solutions, executes backups in order to prevent data loss and corruption and ensures that, in case of



malfunctioning, the systems installed can be restored. Documents on paper format that also contain personal data are stored by the Controller in a lockable premise with limited access and equipped with fire and property protection. Documents containing personal data and processed manually, in order to comply with the legal obligation of the Controller to retain the documents, are to be stored in archives which is also a lockable premise equipped with fire and property protection. If necessary, the Controller shall carry out impact assessment prior to the introduction of new data processing and shall continuously monitor the possible data breaches. If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall, without undue delay, fulfil its legal obligation to communicate/notify.

8. RIGHTS OF DATA SUBJECTS AND EXERCISE THEREOF

Your rights enlisted below shall be exercised by submission of your application to the Controller. Section 2 of this Privacy Notice contains the contact information of the Controller. The Controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

8.1. INFORMATION ON PROCESSING OF YOUR PERSONAL DATA

The data subject shall be informed upon submission of his/her application to the Controller on the data of the data subject that are processed by the Controller and by the processor on behalf of or by the will of the controller, the source thereof, the purpose and period of the data processing, the name, address and the processing activity of the processor, context and effect of the data breach and the measures taken to prevent it, and in case of transfer of the personal data on the legal basis and the recipient of the transfer.

8.2. ACCESS TO THE PERSONAL DATA

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;



- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy shall not adversely affect the rights and freedoms of others.

8.3. RIGHT TO RECTIFICATION

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

8.4. RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;



- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Where the Controller has made the personal data public and is obliged to erase the personal data in accordance with the above, the Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Erasure of personal data shall not be obtained to the extent that processing is necessary for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; for reasons of public interest in the area of public health; for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in; for the establishment, exercise or defence of legal claims.

8.5. RIGHT TO RESTRICTION OF PROCESSING

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted as stated above, such personal data shall, with the exception of storage, only be processed with the data subject's 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 Union or of a Member State.

A data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.



The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

8.6. RIGHT TO DATA PORTABILITY

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

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

In exercising his or her right to data portability as stated above, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of this right shall be without prejudice to the right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The right referred to this section shall not adversely affect the rights and freedoms of others.

8.7. RIGHT TO WITHDRAWAL

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

8.8. SUBMISSION OF COMPLAINTS ADDRESSED TO THE SUPERVISORY AUTHORITY

The data subject may initiate the investigation of the Nemzeti Adatvédelmi és Információszabadság Hatóság (hereinafter: „Authority”) with the purpose of investigation of the legality of the operation of the Controller if the Controller restrict exercising the right of the data subject or rejects the application thereof for exercising its rights; and the data subject may initiate the administrative procedure of the Authority on data protection if the Controller and the processor on behalf of or by the will of the Controller are considered to violate the provisions on data protection determined in legislation or legally binding act of the European Union during processing the data of the data subject.



Name: Nemzeti Adatvédelmi és Információszabadság Hatóság

Seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Address: 1530 Budapest, Pf.: 5.

Phone: 06 1 391 1400

Fax: 06 1 391 1410

Email: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

8.9. RIGHT TO TURN TO THE COURT

The data subject may turn to the court against the Controller, and in relation to the processing operations within the scope of activities of the processor, against the processor if the Controller and the processor are considered to process the personal data of the data subject in a way that violates the provisions on data protection determined in legislation or legally binding act of the European Union.

The Controller and the processor shall be obliged to prove that the processing is in accordance with the provisions on data protection determined in legislation or legally binding act of the European Union.

The data subject may bring the lawsuit, at its choice, to the regional court of jurisdiction by reference either to the place of permanent residence of or to the habitual residence of the data subject. Any person who otherwise do not have legal capacity may be a party in the lawsuit. The Authority may join to the data subject in the lawsuit.

9. FINAL PROVISIONS

The Data Controller reviews the contents of the Privacy Notice regularly and reserves the right to amend it at any time in accordance with its discretion and applicable laws. Amendments of the Privacy Notice shall enter into force simultaneously with the publishing.
