

DATA PROCESSING POLICY

The Blueway Trade Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság as the operator of the website is committed to protect the personal data of natural persons, and undertakes the obligation to perform its data processing accordingly to the protocols and requirements specified in the present Policy and the effective laws, as well as the provisions of the 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 (hereinafter referred to as: GDPR or Regulation), applicable from 25 May 2018.

I. CONTROLLER

Your personal data is being processed by the Blueway Trade Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság as controller (hereinafter referred to as: 'Controller').

Name: Blueway Trade Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság

Registered office and postal address: H-2234 Maglód, Lövéte u. 35.

Company registry number: 13-09-206022

Taxnumber: 25051632-2-13

Company registry court: Fővárosi Törvényszék Cégbírósa (Company Registry Court of Budapest Capital Regional Court)

E-mail address: gaspar@blueway.hu

Telephone: +36302796679

Data protection officer is not engaged by the controller.

II. THE CONTENT AND THE PURPOSE OF THE POLICY

The purpose of this Policy is to ensure that the natural person users of the www.blueway.hu website are appropriately and fully informed by the Controller about the personal data processed by the controller, the source of this data, the purpose, the legal basis and the term of the processing, as well as the name and contact of the processor, the legal title and basis of the transfer of personal data, the rights and the remedy options of the users.

This Policy is applicable to you in the case if you use the website, or contact us as a natural person, as well as we contact you in connection with our services.

III. THE PROCESSED PERSONAL DATA, THE PURPOSE AND THE LEGAL BASIS OF THE DATA PROCESSING

Under GDPR personal data shall mean “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”

The Controller processes the following data of natural persons (hereinafter referred to as: ‘data subject’ or ‘user’):

E-mail contact, correspondence

The Controller provides its e-mail address on the www.blueway.hu website’s contact link, and ensures contact and provides an interface for messaging. Via this interface the user is able to send his message directly to the Controller by providing his name, e-mail address, and telephone number.

E-mails are recorded by the Controller together with the sender’s name, e-mail address, the date of sending, and other personal data provided in the message.

Processed personal data: The name of the e-mail’s sender, the sender’s e-mail address and telephone number, as well as the personal data provided in the message.

The purpose of the data processing: Ensuring contact, recording clients.

The legal basis of the data processing: The freely given consent of the data subject.(Article 6(1)(a) of the Regulation).

Data transfer: Data transfer does not occur without the explicit consent of the data subject.

Processor:

Blazearts Kft. (registered office: H-6090 Kunszentmiklós, Damjanich utca 36. 1. em. 8.), providing online storage.

The term of the data processing: The data processing lasts for the period absolutely necessary for the realisation of the data processing purposes, but not more than 5 years from providing the personal data.

The method of data storage: Electronic.

Consequences of the failure of providing data: The data subject will not be able to contact the Processor.

Measurement and logging of the data regarding the website’s attendance

The Controller continuously logs the following data for statistical purposes, preventing abuses, as well as for the examination of the website's operation:

The time of the visit, IP Address, domain of the visited website.

The basis of the data processing is the freely given consent of the data subject.

The Controller does not combine the collected data with other information, the processed data are not suitable for identifying the data subject.

Cookies

The Processor places certain data on the client's computer in order to better serve the needs of the data subjects. The data subject may remove these from his computer, or disable the use of them in the browser. With the help of the data collected by cookies, the information regarding the use of the Controller's website may be broadened. This makes possible to check if the website's operation is at an optimal level.

The purpose of the data processing: Ensuring the provision of personalized services and the optimal operation of the website.

The legal basis of the data processing: It is the legitimate interest of the Controller to identify users and personalize contents.

(Article 6(1)(f) of the Regulation)

Processed data: The Controller processes the following personal data by applying cookies: chosen language.

The term of the data processing: 5 years

Processing cookies by third party providers

The Processor uses the services of third party companies in order to ensure the operation of its online services. The Controller's contracting partner is Google Inc., service used: Google Maps, Google Fonts. Google maps indicates map information on the website. Google Fonts provides fonts for visualizing textual content on the website.

These services use cookies to analyse the use of the website, and to collect information. The data processing policy of Google Inc. is available at https://www.google.com/intl/hu_hu/policies/privacy/.

IV. SECURITY OF PROCESSING, THE PROTECTION OF PERSONAL DATA

The Controller shall implement appropriate technical and organisational measures and rules of procedure to minimize risk resulting from the data processing, and ensure a level of security

appropriate to the risk. The Controller shall process the personal data confidentially, and protect the data transferred, stored or otherwise processed by him against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or unauthorised access.

The Controller informs its users that electronic messages transferred via internet are vulnerable to certain network threats. The Controller shall commit everything to prevent the occurrence of such threats, however, it is not able to guarantee the safety of the transferred data.

V. THE RIGHTS OF THE USER

The right to be informed:

The user shall have the right to be informed about the processing of his personal data in a brief, transparent, intelligible and easily accessible written form using clear and plain language with the content specified in Article 13 and 14 of GDPR.

The right to access:

Via an e-mail sent to gaspar@blueway.hu, or a letter sent to the address of the registered office, as well as via telephone, the user has the right to obtain confirmation from the Controller as to whether or not personal data concerning him or her are being processed, and, where that is the case, request access to the personal data processed by the Controller as well as the following information:

the purposes of the data processing; categories of the personal data concerned; the recipients, or the categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; 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 user or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, and, 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

user shall have the right to be informed of the appropriate safeguards relating to the transfer. Upon the user's request, the Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the user, the Controller may charge a reasonable fee based on administrative costs. Where the user makes the request by electronic means, and unless otherwise requested by the user, the information shall be provided in a commonly used electronic form.

Right to rectification

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

Right to erasure ('right to be forgotten')

The user shall have the right to obtain from the controller the erasure of personal data concerning him 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 user withdraws consent on which the processing is based, and where there is no other legal ground for the data processing;
- c) the user 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.

Erasure of personal data may not be initiated where the 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; 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; for the establishment, exercise or defence of legal

claims.

Right to restriction of processing:

Upon request of the user, the Controller shall restrict the data processing where one of the following applies:

- a) the accuracy of the personal data is contested by the user, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the user 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 user for the establishment, exercise or defence of legal claims; or
- d) the user has objected to processing pending the verification whether the legitimate grounds of the controller override those of the user.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the user'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 user who has obtained restriction of data processing shall be informed by the Controller before the restriction of processing is lifted.

The right of notification regarding rectification or erasure of personal data or restriction of processing

The user shall have the right to obtain from the Controller the recipients to whom his personal data of have been disclosed. The Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

Right to data portability

The user shall have the right to receive the personal data concerning him, which he has provided to the 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 data subject has freely given his consent to the processing of general or special

personal data, or where the data processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the user prior to entering into a contract, and

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

The user shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to object

The user shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or for the purposes of the legitimate interests pursued by the Controller or by a third party, including profiling based on those provisions. The Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the data processing which override the interests, rights and freedoms of the user or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the user shall have the right to object at any time to processing of personal data concerning him for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed by the Controller for such purposes.

Automated individual decision-making, including profiling

The user 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 similarly significantly affects him.

This right may not be exercised if the decision:

a) is necessary for entering into, or performance of, a contract between the data subject and the Controller;

b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or

c) is based on the data subject's explicit consent.

Right to be informed about personal data breach

The data subject shall have the right to be informed about personal data breach.

The right of withdrawal

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

The user's right to lodge a complaint with the supervisory authority

If the user believes that the processing of the personal data concerning him violates the Regulation, he shall have the right to lodge a complaint with the supervisory authority, in particular in the Member State of his habitual residence, workplace, or the alleged infringement.

Supervisory authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság – Hungarian National Authority for Data Protection and Freedom of Information (postal address: H-1530 Budapest, P.O.Box. 5., registered office: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c., website: www.naih.hu, telephone: 06-1-391-1400, e-mail address: ugyfelszolgalat@naih.hu).

The right to an effective judicial remedy against the controller or the processor

If the user considers that his rights under the Regulation are infringed, he shall have the right to seek action from the court of the Member State in which the Controller conducts its activities. Litigation regarding the protection of personal data is free from any procedural fees.

Damages and restitution

If the data subject has suffered material or non-material damaged resulting from the violation of the Regulation, he shall have the right to claim damages from the Controller or the processor. The Controller shall be liable for any damage resulting from data processing violating the Regulation. The Controller shall be exempt from paying damages if it demonstrates that it is not liable for the event resulting the damage. Where more than one controller or processor, or the controller and the processor are subject to the same data processing, they shall be jointly liable for the damaged occurred.

VI. PROCEDURAL RULES REGARDING THE EXERCISE OF RIGHTS

The Controller shall facilitate the exercise of the user's right. Following the identification of the user, the Controller shall provide information on actions taken in connection with the

exercise of the data subject's rights without undue delay and in any event within one month of receipt of the request. This period may be extended by two further months, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the Controller does not take action on the request of the data subject, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

The Controller shall provide the requested information, the communication about the data subject's right, and in the case if the data subject exercises his rights, the actions in connection with the exercise free of charge. Where requests from a data subject are manifestly unfounded or excessive, the controller may either charge a fee of HUF 3,500 taking into account the administrative costs of taking the action requested, or may refuse to act on the request.

The rights specified in this Policy may be exercised via any reach of the Controller.

The Controller upholds the right to call upon the data subject filing a request to verify his identity.

VII. THE DATA PROCESSORS

The Controller engages the processors specified in the present Policy. These processors provide sufficient guarantees to implement appropriate technical and organisational measures ensuring the protection of the data subject's rights. The Controller shall check the operation of the processor, and prescribe that processors may engage further processors with the consent of the Controller.

VIII. THIRD PARTY PROVIDERS

The Controller engages third party providers in order to provision its own services. With regard to the personal data processed by third party providers, such providers shall be considered as controllers, therefore the data processing policy of theirs shall be authoritative to the data processing. In this Policy, the Controller shall inform users about the data transfer towards third party providers.

IX. DATA TRANSFER

The Controller has informed in this Policy its users about the data transfers. The Controller informs its users that the court, the prosecutor, the investigative authority, the offense authority, the administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information, and other bodies may make an inquiry at the Controller aiming information, the transfer and disclose of data, as well as the yielding of documents.

The Controller – if the authority has specified the exact purpose and the data needed – shall disclose personal data to authorities in an extent absolutely necessary for the realisation of the purpose of the inquiry.

The Controller shall keep a record about the data transfers.

X. MISCELLANEOUS AND CLOSING PROVISIONS

The Controllers may place links on www.blueway.hu, which make other websites available.

The Controller is not liable in any way of the websites' content available through the links placed. Data protection and data processing regulations concerning the websites available through the placed links are not under the effect of this Policy. The Controller is not liable in any way of the use such websites.

The Controller upholds the right to unilaterally modify this Data Processing Policy at any time with the simultaneous notification of the data subjects. By using the www.blueway.hu website following the coming into effect of the modification, the data subject accepts the modified Data Processing Policy.

This Data Processing Policy is effective as of 25 May 2018.

This Data Processing Policy can be accessed and may be downloaded here. www.blueway.hu