

Privacy Notice
www.mediator.hu

This Privacy Notice sets out the rules for the processing of personal data relating to the data subject on the website www.mediator.hu (hereinafter: 'Website') operated by Mediator Group Reklámügynökség Korlátolt Felelősségű Társaság as Controller.

For the purposes of this Privacy Statement, a data subject means a user of this Website (hereinafter: 'data subject' or 'User').

In order to help the interpretation of this Privacy Notice, first of all let us clarify the following terms in accordance with Article 4 of Regulation (EU) 2016/679 of the European Parliament and of the Council (of 27 April 2016) 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 (General Data Protection Regulation, hereinafter referred to as 'GDPR'):

- **'Personal Data'** means 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. [point 1 Article 4 of the GDPR]

- **'Processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. [point 2 Article 4 of the GDPR]

- **'Controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. [point 7 Article 4 of the GDPR]

- **'Processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. [point 8 Article 4 of the GDPR]

- **'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. [point 11 Article 4 of the GDPR]

1. Details of the Controller, Processor (Hosting Service Provider)

Company name:	Mediator Group Reklámügynökség Korlátolt Felelősségű Társaság
Registered office:	1117 Budapest, Dombóvári út 25.
Company registry number:	01-09-864793
Tax number:	13622215-2-43
Represented by:	Managing Director László Biró
E-mail address:	info@mediator.hu
Registered by the Court of Registration of the Budapest Metropolitan Court	

We would like to inform you that as a Controller we use the following data processor - as a hosting provider:

Company name: **Tárhely.Eu Szolgáltató Kft.**
 Registered office: **1144 Budapest, Ormánság utca 4. X. em. 241.**
 Registration number: **01-09-909968**
 Represented by: **Zoltán László Kárpáti, Managing Director**

2. Purpose of data processing, legal basis and duration of data processing

Categories of personal data	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name, e-mail address, phone number, personal data contained in the message submitted by the data subject under the menu item 'Contact'	Means of contact provided on the Website (name: to identify the data subject; e-mail address and telephone number: to enable contact)	The data subject's consent (paragraph a) of Article 6(1) of the GDPR) by providing the data and sending the same to the Controller	Until the goal is achieved, i.e. as long as the Controller fulfils the request submitted to the Controller during the contact.
Name, e-mail address, telephone number, CV, motivation letter	Responding to career offers via the Website (name: applicant's identification; e-mail address and telephone number: providing contacts; CV: presenting the applicant's professional experience; motivation letter — optional—: presenting the applicant's motivation)	The Data Subject's consent (paragraph a) of Article 6(1) of the GDPR) by providing the data on the Careers page and submitting the application.	For 6 months after the end of the selection process for the given position, provided that the data will be deleted if the applicant withdraws their application or consent.
Name, e-mail address, phone number, position of contractual partner's contact person	Ensuring contact with contractual partners, fulfilling contractual obligations	The legitimate interest of the data controller (as well as the contractual partner) based on Article 6 (1) point f) of the GDPR.	Until the contractual contact person changes, but at the latest during the existence of the contract.

Please note that you can withdraw your consent to the processing at any time without giving reasons. The withdrawal of consent does not affect the lawfulness of processing that was carried out based on consent before its withdrawal. [Right to withdraw consent].

The Controller handles contractual contact data in accordance with the provisions of the GDPR. Controller carried out an interest assessment related to his legitimate interest before starting the data processing, which interest assessment will be sent by the Controller to the data subjects upon request.

3. Transmission of Data

The Controller may disclose personally identifiable data e.g. during a legal process, in response to a court order or a subpoena, or in response to a law enforcement agency's request, or where the Controller believes it is necessary to investigate, prevent, or take action with respect to, an illegal act, or as otherwise prescribed by the law for the Controller.

The employees of the Controllers designated for this purpose have access to personal data, and they are obliged to treat and keep confidential the personal data concerning the data subjects they obtain.

4. The data subject's rights relating to data processing

Right to information and access

The data subject has the right to get confirmation from the Controller as to whether or not personal data concerning them are being processed. If their personal data is being processed, the data subject has the right to get detailed information about data processing related to them including the categories of personal data being processed in relation to them.

The Controller shall provide a copy of the personal data being processed. Such information shall be provided for free unless the data subject has already submitted a data request to the Controller for the same set of data within the same year. For any further information requested by the data subject, the Controller may charge a reasonable fee based on its administrative costs.

Right to rectification or supplementation

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning them. If any personal data is incorrect and the correct personal data is also available to it then the Controller will rectify the personal data concerned. 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.

Right to erasure ('right to be forgotten')

The data subject has the right to obtain from the Controller the erasure of their personal data without undue delay. The Controller may satisfy this request if the personal data are no longer necessary for the purposes for which it was collected or otherwise processed. The personal data concerning the data subject shall also be erased if the data subject objects to the processing and there are no overriding legitimate grounds on behalf of the Controller or any third party for the processing. The personal data must be erased by the Controller also if the personal data was unlawfully processed or the personal data has to be erased for compliance with a legal obligation in Union or Hungarian law to which the Controller is subject.

Please note that personal data may not be erased if it is necessary for compliance with a legal obligation, for compliance with a statutory retention obligation or for asserting, enforcing or defending a legal claim.

Right to restriction of processing

The data subject has the right to obtain from the Controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, in which case the restriction shall last for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- the Controller no longer needs the personal data for the purposes of the processing, but the data subject requests the same for the assertion, exercise or defence of legal claims; or the data subject has objected to processing; in this case such restriction shall be valid until it is determined whether or not the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted as described above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the assertion, 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.

The Controller shall communicate any rectification or erasure of personal data or restriction of processing implemented by it to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves a disproportionate effort.

Right to data portability

The data subject has the right to receive the personal data concerning them, which they have 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 where processing is based on consent and processing is done in an automated manner. In exercising their right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. Exercising this right shall not conflict with the right to erasure of data. The above-mentioned 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 controllers. Exercising this right shall not conflict with the rights and freedoms of others.

Right to object

The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on paragraphs (e) or (f) of Article 6(1) of the GDPR, including profiling based on those provisions. In this case the Controller shall 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 which are related to the assertion, exercise or defence of legal claims.

Right to withdraw consent

Refer to section 2.

Exercising the data subject's rights in case of the data subject's death

In case of the data subject's death, the rights that the deceased had as a data subject may be asserted within five years of the data subject's death by the person authorised by the deceased via an instruction to act or through a declaration to be filed with the Controller in a public instrument or in a private deed with full probative force.

If the data subject does not make a legal declaration in accordance with the above during their lifetime, their close relative —as such term is defined in the Civil Code— is also entitled to assert their right to rectification and the right to object to data processing in the absence of such declaration and, if the data processing was already unlawful during the data subject's lifetime or the purpose of data processing has ceased upon the death of the data subject, the close relative is entitled to assert their right to erase data or restrict data processing within five years of the death of the data subject. The close relative who first exercises this right is entitled to assert the rights of the data subject in accordance with this paragraph. The person asserting the data subject's rights in case of the data subject's death shall certify the fact and time of the death of the deceased data subject by a death certificate or a court decision, and their own

identity —and their capacity as a close relative pursuant to the previous paragraph— with a public instrument.

How to exercise the data subject's rights

The data subject may contact the Controller with their requests described in this chapter or with any other questions or requests concerning their personal data at the email address info@mediator.hu.

The Controller shall evaluate the request within 1 month from the date of receipt of the written request. If necessary, taking into account the complexity of the request and the number of pending requests, the Controller may extend the deadline for processing the request. The data subject shall be informed about such extension and its reasons in advance.

If the data subject's request is founded, the Controller shall implement the requested action within the procedural deadline and notify the data subject in writing about the completion of the implementation. If the Controller rejects the data subject's request, it shall make a written decision on it. In its decision, it shall specify the facts on which the decision is based, the justification of its decision by presenting the relevant laws and case decisions, and also inform the data subject about the legal remedies available to them regarding the Controller's decision.

The data subject may be obliged to reimburse the costs related to the exercise of their rights only if the Controller has informed the data subject in writing after receiving their request of the fact that the data subject's request is excessive and at the same time informed them of the amount of the administrative fee, but despite all these circumstances, the data subject maintained their claim in writing. The Controller will not start handling the matter until the data subject has given clear and written feedback.

The data subject obliged to bear the costs shall pay the costs within 8 days of receiving the payment notice issued by the Controller.

5. Legal remedy

If the data subject considers that the processing of their personal data by the Controller violates the applicable data protection laws, in particular the provisions of the GDPR, they may contact the National Data Protection and Freedom of Information Authority (NAIH).

Contact details of the National Authority for Data Protection and Freedom of Information:

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

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Telephone: +36-1-391-1400; fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Regardless of their right to file a complaint, the data subject may go to court if their rights under the GDPR have been violated during the processing of their personal data.

Pursuant to Section 23(3) of the Info Act, the data subject may choose to start action at the court that has jurisdiction according to the data subject's place of residence or their place of stay - as they may deem fit.

The contact details of Hungarian courts can be found through the following link: <http://birosag.hu/torvenyszekek>

6. Closing provisions

If you contact us through any social media site (Facebook, Instagram, Pinterest, YouTube, etc.), please also observe the privacy notices of these social media sites/ websites and become familiar with their content, as we have no influence on the collection of data by external websites, and thus we take no responsibility for it. We disclaim any liability for the protection and confidentiality of any information which you may provide on such external websites.

In accordance with its obligations pursuant to Articles 32-34 of the GDPR, the Controller shall take all necessary steps to ensure the security of the User's data, and take the necessary technical and organizational measures and develop procedures that are necessary for enforcing the data protection and confidentiality regulations and complying with the provisions of the GDPR and Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Info Act).

The Controller reminds data subjects that the person who provides personal data shall be liable for the authenticity of the same. If you do not provide your own personal data or you provide incorrect data/personal data, you shall fully indemnify the Controller and hold it harmless in the event of a third party's claim against the Controller.

The Controller shall perform its data processing operations so as to ensure the protection of the data.

Questions not regulated in this Privacy Notice, shall be governed by the relevant data processing legislation, in particular the GDPR and the Act on the Right to Informational Self-determination.

Please be advised that the Controller is entitled to unilaterally amend this Privacy Notice. Any amended provisions shall apply after they have been published.

This privacy notice was last updated by the Controller on 26 January 2024.

**Mediator Group Reklámügynökség Korlátolt Felelősségű Társaság
Controller**