

## ALTATERRA PERSONAL DATA HANDLING POLICY

Date: 08.08.2019

ALTATERRA treats personal data processed within its systems and in the framework of its procedures very seriously. We ensure high standard of data security.

According to requirements of the 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 – hereinafter referred to as the GDPR – You will find out how ALTATERRA process Your personal data below.

We would like to inform You that the controller of Your personal data is Altaterra Kft., Malom Köz 1, 9431 Fertőd, Hungary, with its registered office in Fertőd, Malom Köz 1, 9431, Hungary.

In all matters concerning personal data processing and exercising rights related to personal data processing You can contact Data Controler to his postal address, or electronically to the following e-mail address: <a href="mailto:dataprotection@altaterra.eu">dataprotection@altaterra.eu</a>.

The personal data you provide will be stored for the duration of your order, or provision of service to You by the Controller as well as for the period of handling potential compliant and until time of prescription of potential claims expires or an obligation to store data, according to law provisions expires, especially obligation to store accounting documents. If you give your consent, your data will be processed until it is withdrawn. In case of profiling we will use data for this purpose until You object to such processing.

Data provided by You can be processed for the following purpose:

- to conclude and perform contract including additional services and managing Your packages the legal basis of processing is necessity of data processing in order to enter into and perform the contract, according to art. 6 (1) letter b) of the GDPR;
- to handle lodged compliant legal basis for processing is necessity of data processing for the performance of the contract, according to art. 6 (1) letter b) of the GDPR;
- transmitting marketing communications through the communication channels indicated by you based on your express consent (Article 6(1)(a) of the GDPR;
- fulfilment of obligations deriving from law provisions by the Controller specifically the Act of 29th September 1994 on accounting – the legal basis for data processing is necessary to fulfil legal obligation imposed on the Controller contained in art. 6 (1) letter c) of the GDPR;
- pursuing claims concerning the agreement entered into the legal basis for processing is necessity of processing in order to fulfil legitimate interests of the Controller, where these legitimate interests are the possibility to pursue claims according to civil law and before amicable courts, contained in art. 6 (1) letter f) of the GDPR;
- handling customer enquiries where the Administrator's legitimate interest is to provide the highest level of service under Article 6(1)(f) of the GDPR;
- Direct marketing of Controller own products and services, including for statistics purpose and for the purpose of profiling. The legal basis for data processing is necessity to pursue legitimate interests of the Controller, where these legitimate interests of the Controller are direct

marketing of the Controller own products and services, according to art. 6 (1) letter f) of the GDPR:

- profiling in order to identify the preferences or needs with relation to products and services and
  presenting adequate offer -the legal basis for processing is legitimate interests of the
  Controller, where these interests are direct marketing of own products and services, according
  to art. 6 (1) letter f) of the GDPR;
- analytical and statistical the legal basis for data processing is necessity to pursue legitimate
  interests of the Controller, where these legitimate interests of the Controller are analysis and
  statistics of its actions, according to art. 6 (1) letter f) of the GDPR;

When we add new purposes of the processing, you will be informed thereof without delay.

Providing of personal data is voluntary, but necessary in order to conclude and perform the contract between You and ALTATERRA concerning your order as well as services and additional products.

Data provided by You will be disclosed to:

- Entities from ALTATERRA group, that provide various services to ALTATERRA, such as accounting, debt collection or IT services and support the process of packages delivery, where such entities process personal data on the basis of agreements entered into with the Controller and exclusively according to its instructions.
- apart from aforementioned entities Your personal data can disclosed exclusively to entities entitled to process Your data on the basis of law provisions.

## You have:

- right of access to Your personal data, their rectification, erasure or limiting their processing;
- right to object to process Your personal data, where the legal basis of processing are the legitimate interests of the Controller. In particular You have right to object to processing for the purpose marketing and profiling;
- right to data portability, i.e. to receive from the Controller Your personal data, in a structured, commonly used and machine-readable format where Your personal data are processed for the purpose of concluding and performing the contract. You can transmit received personal data to another controller.
- right to lodge in a compliant with supervisory authority dealing with personal data protection in Your country.

Expressing consent is voluntary, therefore You can withdraw it at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In order to exercise aforementioned rights, please contact the Controller, whom contact details have been indicated above.