

Privacy Policy

1. Purpose of The Policy

The purpose of this policy is to document the data processing policy of MorphoCom Marketing és Kommunikációs Tanácsadó Kft. (registered seat: Seregély utca 12., Budapest 1037 Hungary; trade register no.: 01-09-716987; registry court: Budapest Metropolitan Court; hereinafter referred to as “Morpho”) in accordance with the prevailing data protection regulations. In the course of its operation, Morpho adheres to data protection and privacy laws, and Morpho’s associates are also aware of the provisions of data protection legislation and the requirements imposed by the data protection authorities.

2. Material and Temporal Scope of the Policy

The Policy applies to all personal data processed and stored by Morpho, to the purpose and time limitations of the processing of data, and to the scope of activities and the relationships of Morpho.

All our associates are required to comply with the provisions of the Policy in processing personal data relating to private individuals. Morpho also has further compliant processes to ensure that contracted providers of outsourced services and other partner companies comply with the legal requirements.

The processing of personal data is limited to the shortest required time possible. Time limit of data processing: only as long as necessary for achieving the objectives of data processing, or until the data are deleted upon the request of the data subject.

This Policy enters into force on 25 May 2018.

3. Principles of Data Processing

Lawfulness, Fair Procedures, and Transparency: Morpho performs the processing of personal data in a manner that is legitimate and fair, and transparent to the data subjects. Required information is provided to the data subjects in a concise, easy-to-access and easy-to-understand manner, in a clear and comprehensible language.

Purpose Limitation: personal data are collected only for specific, clear and legitimate purposes, and the data are not processed in a manner that is not compatible with such purposes.

Data Efficiency: the personal data processed are appropriate and relevant to the purposes of processing, and are limited to specific activities.

Accuracy: the personal data processed are accurate and up-to-date, as necessary; Morpho will take all reasonable steps to immediately delete or correct such personal data that are inaccurate as regards the purposes of the data processing.

Limited Retainment: the personal data processed are stored in such a format that allows the identification of data subjects only within the time frame necessary to achieve the purposes of the data processing. Any longer term storage of the personal data will only take place for the purpose of archiving data of public interest, for historical or scientific research purposes, or for statistical purposes.

Integrity and Confidentiality: Morpho processes the personal data in such a manner as to ensure, by the application of appropriate technical or organizational measures, the proper security of the data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage to such data.

Accountability: Morpho is responsible for being compliant with this Policy, and shall be able to prove such compliance.

4. Rights of Data Subjects

Morpho takes appropriate measures to ensure that all information provided to the data subjects as regards the processing of their personal data be communicated in a concise, transparent, comprehensible and easily accessible manner, and in a clear and unambiguous form, particularly as regards any information communicated to children. The information is provided in writing or any other means, including, where appropriate, electronic formats. Spoken information may be provided, at the request of the data subject, provided that the identity of the data subject has been verified otherwise. Such information and measures are provided by Morpho free of charge.

Data subjects are entitled to request feedback from Morpho on whether their personal data are being processed, and, if so, they are entitled to request access to such personal data and to information on the processing thereof.

Data subjects are entitled to request Morpho to rectify any inaccuracies in their personal data without undue delay.

Data subjects are entitled to request Morpho to delete their personal data without undue delay. Morpho is obliged to delete the personal data of the data subject without undue delay if such personal data are no longer required for the purposes for which they were collected or otherwise processed; if the data subject withdraws their consent that serves as the legal basis for the processing of the data and no other legal basis pertains; if the data subject objects to the processing of their data and there is no legitimate priority reason for such processing; or the personal data were processed unlawfully.

Data subjects are entitled to request Morpho to restrict the processing of their personal data.

Data subjects are entitled to receive their personal data provided to Morpho in a properly segmented, broadly used, machine-readable format, and are also entitled to forward such data to other data controllers without obstructions from Morpho.

Data subjects may send such requests for information on the processing of their data, for the rectification of their data, or, except as provided by the law, for the deletion of their data to the contacts indicated at the time of collecting the data or to Morpho's contacts indicated elsewhere. Morpho will lock the personal data upon the data subject's explicit request, or if it is assumed that an otherwise requested deletion thereof would violate the data subject's legitimate interests. Such locked personal data can only be processed as long as the particular purpose of data processing that made the deletion of the data impossible is still valid. Morpho will delete the personal data upon the data subject's requests; if the purpose of the data processing has ceased; if the statutory deadline for the storage of the data has expired; or if a court or the Hungarian National Authority for Data Protection and Freedom of Information orders the deletion thereof. Morpho has a deadline of 30 days for the deletion, locking, or rectification of the data.

5. Legal bases of Data Processing

Chapter II., article 6 of Regulation No. 2016/679 of the European Parliament and of the Council.

6. Scope of the Personal Data Processed by Morpho

Data subjects may request a copy of the records of personal data processed by Morpho, including the scope of the data processed, the purpose of processing, the place and time frame of storage, and the circle of lessees, by sending an email to gdpr@morpho.hu. The records are reviewed by Morpho at regular intervals and as needed.

7. The Means of Storing the Data, the Secureness of Data Processing

Morpho processes the personal data in such a manner as to ensure, by the application of appropriate technical or organizational measures, the proper security thereof. Aided by its IT partners, Morpho adopted generally accepted technology solutions to prevent the loss, modification, destruction, or abuse of personally identifiable information. In order to protect the data, Morpho implements appropriate technical and organizational measures, both in planning and in performing the data processing, in light of the present state of sciences and technologies, and of the nature, scope, circumstances and purposes of the processing, and of the varying probability and severity of risks concerning the rights and freedoms of natural persons.

Morpho will make all possible efforts to prevent the unauthorized or unlawful sharing, processing, accidental loss, destruction or damage of the information and data by implementing appropriate confidentiality commitments and technical and organizational security measures. Only such associates have access to the information that have the proper clearances, and that have undertaken an obligation of confidentiality.

Data subjects may request further information on security measures by sending an email to gdpr@morpho.hu.

8. The Time Frame of Data Processing, the Modification and Deletion of Data

Morpho retains the collected personal data only as long as such data are required for the explicit purposes the data subject consented to, or as long as required by law to retain them.

Upon the written request of the user, the controller shall delete or modify the data provided by the user within 10 working days. Such requests shall be sent by email to gdpr@morpho.hu.

9. Transmission of Data

Morpho is aware that the data of the data subjects are valuable, and does its best to protect these data in the course of processing.

In case this is necessary for the purposes for which the data subject provided the personal data to Morpho, Morpho may share such data with its partners. Under appropriate security measures and legal constructs, Morpho may forward the personal data collected to clients and third parties that provide Morpho with IT, identity management, website operations, data analysis, backup, data security and storage, payroll and healthcare services.

In accordance with and as long as required by the applicable laws, Morpho may forward the data to law enforcement authorities, regulatory or other government agencies, or other third parties.

Morpho does not share any secondary or non-related information with such other third parties and partners unless the data subjects have been notified of the possibility thereof at the time of collection.

10. Modifying the Privacy Policy

The controller reserves the right to unilaterally modify and amend this Privacy and Data Processing Policy at any time and at its sole discretion. Following any such modification, all data subjects concerned shall be properly informed.

11. Major Related Laws

The Fundamental Law of Hungary;

Regulation No. 2016/679 of the European Parliament and of the Council;

Act no. CXII. of 2011 on informational self-determination and the freedom of information;

Act no. V of 2013 on the Civil Code (Ptk.);

Act VI. of 1998 on the promulgation of the Strasbourg convention of 28 January 1981 for the protection of individuals with regard to automatic processing of personal data.

12. Competent Authorities

In case the data subject believes that Morhpo's processing of the personal data is not according to what has been outlined herein, or not in accordance with the applicable laws, they may appeal to the Hungarian National Authority for Data Protection and Freedom of Information with their complaint or request for remedy:

Hungarian National Authority for Data Protection and Freedom of Information

Registered seat: Szilágyi Erzsébet fasor 22/C, Budapest 1024 Hungary

Appendix 1

Definitions

The definitions of the terms used in this Policy.

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.

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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

restriction of processing: means the marking of stored personal data with the aim of limiting their processing in the future.

filing system: means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.

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.

processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

personal data breach: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

recipient: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

third party: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

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.

personal data breach: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

biometric data: means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.

data concerning health: means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

main establishment:

- as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;
- as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation.

representative: means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation.

cross-border processing:

- processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or
- processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

enterprise: means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity.

information society service: means a service as defined in point (1) b) of Article (1) 1 of Directive (EU) 2015/1535 of the European Parliament and of the Council.

international organisation: means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.