

Privacy Notice for the use of the Website

Polifoam Műanyagfeldolgozó Kft. (registered office: H-1097 Budapest, Táblás utca 34/A.) as the data controller (hereinafter referred to as the “**Data Controller**”) informs you that pursuant to Act CXII of 2011 (“**Data Protection Act**”) and Regulation (EU) 2016/679 (“**GDPR**”), your personal data will be processed in the following manner and for the following purposes:

1. Subject of the data processing

The Data Controller processes the – non-sensitive – personal data (hereinafter referred to as the “**Data**” or “**Personal Data**”) (in particular name, surname, company name, email address, etc.) provided by you as a party providing products and services under a contract with the Data Controller, while browsing the Data Controller’s website: www.wellstepp.eu (hereinafter referred to as the “**Website**”) and/or in an enquiry sent to the Data Controller.

2. Purposes and legal grounds for the data processing

We process your personal data for the following purposes:

A. for contractual purposes, without your prior consent required, namely:

- to manage and maintain the Website;
- to process the enquiries received from you;
- to prevent or detect fraudulent activities or a harmful misuse of the Website;
- to exercise the Data Controller's rights, such as the right of defence before a court;
- to comply with the obligations laid down by the laws, regulations or EU legislation and by the authorities.

B. for direct marketing/marketing purposes, subject to your prior consent, including the following:

- to inform you through regular letters, phone calls, emails, newsletters or initiatives and commercial offers from the Data Controller. In addition, if you are already our Customer, we may send you commercial emails to the email address you have provided us regarding the services and products of the Data Controller that you have already used. In each email sent, you will have the opportunity to unsubscribe from further mailings by clicking on the link provided.

3. Method of the data processing

Your data will be processed electronically through data collection, registration, organisation, storage, consultation, elaboration, modification, selection, data mining, comparison, use, interconnection, blocking, communication, erasure and destruction operations.

4. Data retention

The Data Controller shall process the Personal Data for the time necessary to fulfil the purposes set out above, up to the following time limits:

- for contractual purposes: for 5 years from the termination of the contractual relationship;
- for marketing purposes: for 2 years after the data collection;
- for the management of cookies: for the time period set out in the Cookie Policy.

5. Access to the Data

Your Data may be accessed for the above purposes by the following persons:

- the Data Controller's employees and/or cooperating partners, as the person responsible for the data processing and/or as system administrator;
- third parties or other persons (e.g. IT service providers, service providers, credit institutions, professional firms, etc.) who carry out outsourced activities on behalf of the Data Controller and process the Data as external Data Processors or Joint Data Controllers.

6. Disclosure of the Data

Your Data may also be disclosed without your prior consent, upon request, to supervisory authorities, police or judicial authorities which, in their capacity as independent Data Controllers, process the Data for institutional purposes and/or in the course of investigations and audits in accordance with the law. Your Data may also be disclosed to third parties (e.g. partners, contractors, agents, etc.) who will act as independent Data Controllers in order to carry out activities necessary for the above purposes.

7. Data transmission

Your Data will not be transferred to countries outside the EU.

8. Nature of the Data disclosure and consequences of refusal to reply

You must provide your data for contractual purposes: these Data are necessary for the data Controller's services, and if you choose not to provide your Data, you will not be able to use the Data Controller's services.

The provision of data for direct marketing/marketing purposes is voluntary, and if you choose not to provide your Data, this will not affect the use of the Data Controller's services. Accordingly, you may choose not to provide your Data, in which case you will not receive our commercial messages.

9. Rights of the data subjects

The Data Controller informs you that as a data subject you have the following rights:

- to receive confirmation and clear information about the existence or absence of Personal Data relating to you, even if you have not yet registered;
- to receive information and, if necessary, a copy of: (a) the source and category of the Personal Data; (b) the method used, if the processing is carried out by electronic means; (c) the purposes and means of the data processing; (d) information to identify the Data Controller and the Data Processors; (e) the persons or categories of persons who may receive the Personal Data or who may have access to them, in particular if the recipient is in a country outside the EU or is an international organisation; (f) the duration of the storage of the Personal Data or, where this is not possible, the criteria for determining this duration; (g) the existence of automated decision-making processes and, if any, the method behind them and their relevance and consequences for the data subject; (h) the existence of appropriate safeguards in the event of transfers of Personal Data to a country or international organisation outside the EU;
- to receive without delay any updates, corrections or, if you are interested, the integration of incomplete Data;
- to obtain the erasure, anonymisation or blocking of the Data in the following cases: (a) where the Data have been unlawfully processed; (b) where the Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed; (c) where you withdraw your consent on which the data processing is based and there is no other legal basis for the data processing; (d) where you object to the data processing and there is no legal basis overriding this; (e)

in accordance with the legal obligations applicable to the Data Controller; (f) where the Data relate to children.

The Data Controller may refuse to erase the Data if the data processing is necessary for: a) the exercise of the right to freedom of expression and information; (b) the performance of a task carried out in the public interest or in the exercise of official authority in accordance with a legal obligation; (c) reasons of public interest in the field of public health; (d) scientific or historical research or statistical purposes of public interest; (e) the establishment, exercise or defence of legal claims;

- to restrict the data processing where: (a) the accuracy of the Personal Data is questionable; (b) the data processing is unlawful and the data subject opposes the erasure of the Personal Data; (c) the Data is requested for the purpose of lodging a legal complaint; (d) where the data subject has objected to the data processing, pending verification that the Data Controller's legal grounds override those of the data subject;
- to receive Personal Data about you in a structured, commonly used, machine-readable format and transfer it to another data controller without hindrance from the Data Controller to whom you have provided the Personal Data, provided that the data processing is carried out in an automated format;
- to **object**, in whole or in part: (a) to the processing of Personal Data concerning you based on legitimate interest or in the public interest or on the exercise of official authority, even if it is necessary for the purposes of the collection of the Data; (b) to the processing of Personal Data concerning you for the purposes of sending advertising material, direct marketing, market research or commercial communications, without the intervention of the operator, by automated calling system, email and/or traditional marketing methods (telephone and/or paper mail);
- to submit a complaint to the competent supervisory body;

Where necessary, in the above cases, the Data Controller is obliged to communicate your exercise of rights to any third party to whom it has transferred the Personal Data, except in certain specific cases (e.g. where this proves impossible or would involve a disproportionate effort).

10. Ways to exercise your rights

You can exercise your rights at any time:

- by sending a registered letter to the address of the Data Controller;
- by sending an email to the following email address: polifoam@trocellen.com;
- by calling the following phone number: +3613479800.

11. The Data Controller, the Data Processor and the persons responsible for the data processing

The Data Controller:

Polifoam Műanyagfeldolgozó Kft.(registered office: H-1097 Budapest, Táblás

utca 34/A.) The appointed Data Protection Officer:

Dr. SIMÁNYI Zsolt

Address: H-1016 Budapest, Szirtes út 11. fszt. 1.

Phone number: +36302019730

Email address: zsolt.simanyi@snlegal.hu

An up-to-date list of the Data Processors and Joint Data Controllers is available for inspection at the Data Controller's registered office and will be sent to you electronically upon request.

[Budapest], [..... March 2023]

