

**Stringbike Kft.**

**GDPR - Privacy Policy**

Effective date: 15 May 2021.

## **Controller details, the purpose of this Policy**

Name of controller:	Stringbike Kft. (hereinafter as: „Stringbike”)
Registered seat:	3561 Felsőzsolca, Bódva út 7.
Branch:	1211 Budapest, Duna lejáró 7.
Email:	szebenyi@stringbike.com

The purpose of this Privacy Policy (hereinafter as the ‘Policy’) is to regulate the processing of personal data at Stringbike Kft. and to ensure the rights of data subjects and to comply with the requirements set for in the relevant legal regulations.

This Policy shall be subject to review and update within one month following any changes in the relevant legal regulations on data protection, or, where there is none, every six months. Should they fail to review and update this Policy as required, then this Policy shall apply with the changes effective in the modified legal regulations. In the event data of controller or the National Authority for Data Protection and Freedom of Information, no modification in this Policy but only an update is National required.

In the event of any discrepancy involved between this Policy and other internal company policies or Stringbike may detect legal practice (case-law) or authority guideline that conflict the provisions in this this Policy, then Stringbike shall voluntarily review and update its practices and processes and revise its regulations as soon as possible.

### **1. SCOPE AND DEFINITIONS**

#### **1.1. Scope of this Policy**

##### **1.1.1. Personal scope**

The personal scope of this Policy shall extend to (1) persons performing processing or processing activities on behalf of Stringbike (employees or other persons in working contractual relationship established with Stringbike) and (2) to natural persons of whom Stringbike control personal data (data subjects), and to relative of deceased data subject provided the Hungarian law orders the application of the Regulation (EU) 2016/679 of the European Parliament and of the Council or Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act") to the case in concern.

1.1.2. Material scope

The material scope of this Policy shall extend to the personal data controlled by Stringbike as controller or processor.

1.1.3. Temporal scope

This Policy shall come into effect as of 15 May 2021. This Policy shall be subject to review and update where the Hungarian or European legal regulations on the control of personal data are modified.

2. **UNDERLYING REGULATIONS**

The following laws and legal regulations are of key importance and contain significant underlying information in connection with this Policy:

- 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 ('General Data Protection Regulation' or the 'Regulation')
- Act V of 2013 on the Civil Code of Hungary;
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act");
- Act I of 2012 on the Labour Code;
- Act LXVI of 1992 – on Keeping Records on the Personal Data and Address of Citizens;
- Act C of 2000 on Accounting;
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services;
- Act XLVIII of 2008 on – Essential Conditions of and Certain Limitations to Business Advertising;
- Act CLV of 1997 on Consumer protection.

(this list is incomplete and may change from time to time)

3. **DEFINITIONS**

3.1. **Personal data**

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

**3.2. Special categories of personal data**

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, and furthermore other data specified in the Privacy Act.

**3.3. Processing**

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.

**3.4. Controller**

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.

**3.5. Processor**

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

**3.6. Third party**

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 authorised to process personal data.

**3.7. Consent of the data subject**

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.

**3.8. Personal data breach**

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**3.9. EEC-state**

A member of the European Union and other state member of the treaty establishing the European Economic Community, and the state whose citizen's legal status is identical with those citizens of states that member of the treaty establishing the European Economic

Community in accordance with an international treaty concluded between the European Union and its member states and the state that is not member of the treaty establishing the European Economic Community.

**3.10. Third country**

Any state that is not an EEC state.

**3.11. Profiling**

Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**3.12. Pseudonymisation**

The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person

**3.13. Joint processing**

When the purpose and means of processing are jointly determined by Stringbike and an other controller or controllers.

**I. Stringbike as controller**

**4. PRINCIPLES**

4.1. In the interest of data subject's assertion of right on personal data, Stringbike shall respect the principles of data protection law applicable to these services and laid down in the above-referred legal regulations, as follows:

4.1.1. Personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject (for possible legal grounds see clause 5).

4.1.2. Personal data are controlled for specified, explicit, fair, and legitimate purposes.

4.1.3. Only personal data adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4.1.4. ensures that personal data are accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

4.1.5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

- 4.1.6. Personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 4.1.7. As regards to personal data control, Stringbike shall be responsible for, and be able to demonstrate compliance with the above principles in line with the principle of accountability.
- 4.1.7.1. Stringbike's data protection officer shall be responsible for regulating and initiating changes to the personal data protection. If any Stringbike employee is exposed to any circumstance affecting the personal data processing of the company (receives any request from data subject regarding processing, reveals personal data breach, or comes to know any other relevant information), then he or she shall inform his or her direct superior immediately. This direct superior shall inform the data protection officer. The data protection officer informs Stringbike's managing director and forwards the relevant documents to him.

## 5. THE BASIS FOR PROCESSING

- 5.1. Stringbike shall process personal data only if
  - 5.1.1. the data subject has given consent to the processing of his or her personal data;
  - 5.1.2. 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 data subject prior to entering into a contract;
  - 5.1.3. processing is necessary for compliance with a legal obligation to which Stringbike is subject;
  - 5.1.4. processing is necessary for the performance of a task carried out in the public interest;
  - 5.1.5. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
  - 5.1.6. processing is necessary for the purposes of the legitimate interests pursued by Stringbike or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- 5.2. If the basis for the processing shall be the ground specified in clause 5.1.6 above, then Interest Balancing Test shall be conducted. In the test,
  - 5.2.1. identify what construes Stringbike's or a third party's legitimate interest;
  - 5.2.2. investigate what construes the interests or fundamental rights and freedoms of the data subject which require protection of personal data;
  - 5.2.3. based on the factors described in clauses 5.2.1 and 5.2.2. a preliminary Interest Balancing Test shall be conducted;
  - 5.2.4. Depending on the outcome of the preliminary Interest Balancing Test if the results are not clear, then further warranties shall be added to protect the rights of data subject.
  - 5.2.5. Under the principle of accountability (see clause 4.1.7.) and performance and results of interest balance test specified in clause 5.2.1 to 5.2.4 shall be documented.

## 6. SPECIAL CATEGORIES OF PERSONAL DATA

- 6.1. Stringbike processes data in the special categories of personal data on the basis of explicit consent given by the data subject (or another basis as specified in Article 9 in GDPR).
- 6.2. Without the explicit consent described in clause 6.1. herein Stringbike shall erase the document containing a data belonging to any of the special categories of personal data submitted by the data subject without making a copy.
- 6.3. The consent under clause 6.1. herein shall be documented properly.
- 6.4. Where the data subject has not given consent to processing, the processing of personal data shall be lawful in the following cases even without the consent of the data subject:
  - 6.4.1. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
  - 6.4.2. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
  - 6.4.3. processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
  - 6.4.4. processing relates to personal data which are manifestly made public by the data subject;
  - 6.4.5. processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
  - 6.4.6. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;
  - 6.4.7. processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional;
  - 6.4.8. processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;
  - 6.4.9. processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and

provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject

## 7. INFORMATION TO BE PROVIDED TO THE DATA SUBJECT

- 7.1. Primarily, Stringbike collects personal data relating to a data subject from the data subject. Where personal data relating to a data subject are not collected from the data subject, then Stringbike provides the data subject with all of the following information:
  - 7.1.1. the identity and the contact details of Stringbike and its representative;
  - 7.1.2. the contact details of Stringbike's data protection officer;
  - 7.1.3. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
  - 7.1.4. the categories of the relevant personal data;
  - 7.1.5. the recipients or categories of recipients of the personal data; where applicable, the information specified in the General Data Protection Regulation in the case of transfer of personal data to third countries;
  - 7.1.6. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
  - 7.1.7. if the basis for processing is the basis described in clause 5.1.6, then Stringbike's legitimate interest;
  - 7.1.8. the fact that the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
  - 7.1.9. where the processing is based on consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
  - 7.1.10. the right to lodge a complaint with a supervisory authority 'NAIH', and to an effective judicial remedy, including an indication that data subject may, at his own discretion, bring the case to a court of his or her permanent address or place of stay;
  - 7.1.11. from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;
  - 7.1.12. 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.
- 7.2. The controller shall provide the information referred to in clause 7.1. within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed. If the personal data are to be used for communication with the data subject, then the information shall be provided at the latest at the time of the first communication to that data subject.
- 7.3. The exercise of the right to provide information may be rejected only in the cases listed in the paragraph (5) in Article 14 in the General Data Protection Regulation.

## 8. RIGHT OF ACCESS BY THE DATA SUBJECT

- 8.1. At data subject's request, Stringbike shall give a confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
  - 8.1.1 the purposes of the processing;
  - 8.1.2 the categories of personal data concerned;
  - 8.1.3 the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - 8.1.4 where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - 8.1.5 the existence of data subject's right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
  - 8.1.6 the right to lodge a complaint with a supervisory authority and to an effective judicial remedy, including an indication that data subject may, at his own discretion, bring the case to a court of his or her permanent address or place of stay;
  - 8.1.7 where the personal data are not collected from the data subject, any available information as to their source;
  - 8.1.8 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.
  - 8.1.9 Where personal data are transferred to a third country, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.
- 8.2. Stringbike shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

## 9. RIGHT TO RECTIFICATION AND ERASURE

- 9.1. At data subject's request, Stringbike shall rectify without undue delay any inaccurate personal data concerning him or her, taking into account the purposes of the processing, and at data

subject's request Stringbike shall complete incomplete personal data, including by means of providing a supplementary statement.

- 9.2. At data subject's request, Stringbike shall erase without undue delay any personal data concerning him or her if
  - 9.2.1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - 9.2.2. the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
  - 9.2.3. the data subject objects to the processing, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for the purpose of direct marketing ;
  - 9.2.4. the personal data have been unlawfully processed;
  - 9.2.5. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which Stringbike is subject;
  - 9.2.6. the personal data have been collected in relation to the offer of information society services to children;
  - 9.2.7. The exercise of the rights specified in clause 9 herein may be restricted only in the exceptional cases listed in the General Data Protection Regulation.
- 9.3. Stringbike shall communicate any rectification or erasure each recipient to whom the personal data have been disclosed unless this proves impossible or involves disproportionate effort. Stringbike shall inform the data subject about those recipients if the data subject requests it.

## 10. **RIGHT TO RESTRICTION OF PROCESSING**

- 10.1. At data subject's request Stringbike shall restrict processing where
  - 10.1.1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
  - 10.1.2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - 10.1.3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  - 10.1.4. the data subject has objected to processing performed on the ground of legitimate interest or of public interest pending the verification whether the legitimate grounds of the controller override those of the data subject.
- 10.2. Stringbike shall communicate any restriction of processing each recipient to whom the personal data have been disclosed unless this proves impossible or involves disproportionate effort. Stringbike shall inform the data subject about those recipients if the data subject requests it

## 11. **RIGHT TO DATA PORTABILITY**

- 11.1. In the cases defined in the GDPR, data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to Stringbike in a structured, commonly

used and machine-readable format and have the right to transmit those data to another controller, where

- 11.1.1. the processing is based on consent pursuant to General Data Protection Regulation or on a contract as a legal ground, or
  - 11.1.2. the processing is carried out by automated means.
- 11.2. As regards to the exclusion and restriction of exercise of the right of data portability the rules in the General Data Protection Regulation shall apply.

## 12. **RIGHT TO OBJECT**

- 12.1. The data subject 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 or her which is based on public interest or legitimate interest, including profiling. Stringbike shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- 12.2. At the latest at the time of the first communication with the data subject, the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

## 13. **AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING**

- 13.1. Stringbike shall apply decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her only if
- 13.1.1. is necessary for entering into, or performance of, a contract between the data subject and Stringbike;
  - 13.1.2. is authorised by Union or Member State law to which Stringbike is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests;
  - 13.1.3. is based on the data subject's explicit consent.
- 13.2. As regards to automated decision-making and profiling the rules in the General Data Protection Regulation shall apply.

## 14. **PERSONAL DATA BREACH MANAGEMENT AS CONTROLLER**

- 14.1. In the case of a personal data breach, a Stringbike shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the National Authority for Data Protection and Freedom of Information.
- 14.2. When the personal data breach is not likely to result in a risk to the rights and freedoms of natural persons, the notification by the controller is not required. This decision shall be made by the executive manager based on the proposal of the data protection officer and taking all circumstance of the case into consideration.

- 14.3. Stringbike shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.
- 14.4. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, Stringbike shall communicate the personal data breach to the data subject without undue delay.
- 14.5. The communication to the data subject shall not be required if
  - 14.5.1. Stringbike has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption; or
  - 14.5.2. Stringbike has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise; or
  - 14.5.3. It would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner

## 15. **JOINT CONTROLLING**

- 15.1. In the case of joint controlling, Stringbike and two or more controllers shall in a transparent manner, by means of an arrangement between them, determine their respective responsibilities for compliance with the obligations under this Regulation, in particular as regards the exercising of the rights of the data subject and their respective duties to provide information. The arrangement between Stringbike and additional controller designates a contact point for data subjects.
- 15.2. The essence of the arrangement referred to in clause 15.1. shall be made available to the data subject.
- 15.3. Irrespective of the terms of the arrangement referred to in paragraph 15.1., the data subject may exercise his or her rights under this Regulation in respect of and against each of the controllers.

## 16. **PROCESSOR**

- 16.1. As controller, Stringbike use only processors that meet the requirements in the General Data Protection Regulation. The processing contract shall be made in writing, and whose content shall meet the requirements regulated in this clause.
- 16.2. The processing contract shall stipulate that the processor shall not engage another processor without prior specific or general written authorisation of the controller. Where a processor engages another processor for carrying out specific processing activities on behalf of the controller, the same data protection obligations as set out in the contract or other legal act between the controller and the processor shall be imposed on that other processor by way of

a contract or other legal act under Union or Member State law, in particular providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of this Regulation.

- 16.3. That contract shall stipulate that the processor processes the personal data only on documented instructions from Stringbike, including with regard to transfers of personal data to a third country or an international organisation, unless required to do so by Union or Member State law to which the processor is subject; in such a case, the processor shall inform Stringbike of that legal requirement before processing, unless that law prohibits such information on important grounds of public interest.
- 16.4. That contract shall ensure that persons authorized to control personal data undertake binding obligation of secrecy or shall be under binding obligation of secrecy by law;
- 16.5. That contract ensures that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.
- 16.6. That contract shall conclude that processor assists Stringbike by appropriate technical and organisational measures, insofar as this is possible, for the fulfilment of Stringbike's obligation to respond to requests for exercising the data subject's rights.
- 16.7. That contract shall conclude that processor assists Stringbike in its exercise of obligation to ensure processing security, report personal data breach to the authorities, communicate personal data breaches to the data subjects, data protection impact assessment, and prior consultation.
- 16.8. at the choice of the controller, deletes or returns all the personal data to Stringbike after the end of the provision of services relating to processing, and deletes existing copies unless Union or Member State law requires storage of the personal data.
- 16.9. That contract shall conclude that the processor makes available to Stringbike all information necessary to demonstrate compliance with the obligations laid down in this General Data Protection Regulation, and allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller.
- 16.10. That contract shall conclude that the processor shall immediately inform the controller if, in its opinion, an instruction infringes this General Data Protection Regulation or other Union or Member State data protection.

## **II. Stringbike as processor**

### **17. CONDITIONS FOR DATA PROCESSING**

17.1. If Stringbike acts as processor, then the client, in its capacity of a controller, shall be responsible to determine the legal ground and lawfulness of personal data processing performed in connection with the service

17.2. Stringbike shall make a written agreement on processing services with the client (partner).

## 18. **SUPPORT TO CONTROLLER IN THE PROVISION OF RIGHTS OF THE DATA SUBJECT**

18.1. Stringbike as processor shall support client (partner) as controller to be able to provide the rights of data subject specified in the General Data Protection Regulation. In that respect, Stringbike shall cooperate with client (partner) in order to ensure that client (partner) is able to perform its duties as controller.

18.1.1. Stringbike shall render services in a way that client (partner) as controller shall give the data subject a confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information on data subject.

18.1.2. Stringbike shall render services in a way that client (partner) as controller shall ensure the right of rectification or erasure for the data subject. At the request of client as controller the personal data shall be erase immediately.

18.1.3. Stringbike shall render services in a way that client (partner) as controller shall ensure the right of restriction of processing of personal data for the data subject.

18.1.4. Stringbike shall render services in a manner that after data subject has sent a request to client acting as controller, the data subject shall be entitled to be provided with personal data concerning him or her which he or she has provided to the controller in a structured, commonly used, machine-readable and interoperable format.

## 19. **SUB-PROCESSORS**

19.1. Stringbike shall not engage another processor without prior specific or general written authorisation of the controller. In the case of general written authorisation, Stringbike shall inform the client controller of any intended changes concerning the addition or replacement of other processors.

19.2. Processing by a processor shall be governed via Stringbike by the same liabilities of data protection as described in the contract specified in clause a 17.2. herein.

## 20. **PERSONAL DATA BREACH MANAGED AS PROCESSOR**

20.1. As soon as Stringbike acting as processor becomes aware that a personal data breach has occurred, Stringbike shall notify the personal data breach to client (partner) as controller without undue delay.

20.2. Stringbike shall hand over all available information during notification, and shall act as ordered by client (partner) in order to remedy personal data breach.

## 21. **RECORDS OF PROCESSING AND PROCESSING ACTIVITIES**

- 21.1. Stringbike shall maintain a record of processing activities.
- 21.2. In the event Stringbike also acts as processor, then maintain a record of processing activities with contents specified in the General Data Protection Regulation.
- 21.3. The data protection officer shall be responsible for maintaining of such records. Stringbike employees shall report any activities planned with regard to personal data processing or data processing to the data protection officer and the managing director. After consulting the data protection officer, the managing director, once the necessary legal opinions are available, enters the change to the record in concern.

### III. Closing provisions

#### 22. LEGAL REMEDIES

- 22.1. In case of an alleged injury in connection with the processing of data of any data subject, first please write an email to the data protection officer: [dpo@stringbike.hu](mailto:dpo@stringbike.hu). In case of alleged or actual injury, you may bring a legal action to the competent District Court, or to the Metropolitan Court in the capital, or has the right to complain to the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11; [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), +36-1-3911400, [www.naih.hu](http://www.naih.hu); 1363 Budapest, Pf.: 9.) The data subject may decide, at his or her own discretion, to bring a legal action to the District Court competent for the place of residence or place of stay.

Budapest, 15 May 2021.