

## INFORMATION NOTE ON DATA MANAGEMENT

The aim of this Information Note on Data Management (hereinafter referred to as: the Information Note) is to provide you with detailed information about the processing of your personal data on the website of NT Food Production and Trade Limited Liability Company (registered office: H-6100 Kiskunfélegyháza, District VIII, lot number: 04/94, hereinafter referred to as: NT Llc. or the “Data Manager”): [www.kunsagieden.hu](http://www.kunsagieden.hu) (hereinafter referred to as: the “Website”) and to ensure the lawful management and protection of your personal data. NT Llc. is committed to complying with the legislation on personal data, with a particular regard to Regulation (EU) 2016/679 of the European Parliament and of the Council (“General Data Protection Regulation”) and Act CXII of 2011 on information self-determination and freedom of information (Hungarian abbreviation: Infotv.). Please read this Information Note carefully. The basic concepts relating to personal data and the relevant legislation are set out in Article I of this Information Note.

For more information about the activities of NT Food Production and Trade Limited Liability Company, please visit [www.ntkft.hu](http://www.ntkft.hu).

### I. Data protection legislation and glossary of definitions

#### GDPR

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 Regulation (EC) No 95/46/EC (General Data Protection Regulation) (the full text of the GDPR is available [here](#))

#### Infotv.

Act CXII of 2011 on information self-determination and freedom of information (the full text of the Infotv. is available [here](#))

#### NAIH

Hungarian National Authority for Data Protection and Freedom of Information

#### Data subject

A natural person identified or identifiable on the basis of any information.

#### Identifiable natural person

A natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, 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 the natural person.

#### Personal data

Any information on the identified or identifiable natural person (hereinafter referred to as: the “data subject”).

#### Special categories of personal data

Any data falling under special categories of personal data, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership, furthermore, genetic data and biometric data intended to identify natural persons individually, healthcare data and personal data concerning the sexual life or sexual orientation of natural persons.

#### Healthcare data

Personal data relating to the physical or mental health of a natural person, including also data relating to healthcare services provided to a natural person which contain information about the health status of the natural person.

#### Data management

It 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.

#### Data Manager

It 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 data controller or the specific criteria for its nomination may be provided for by Union or Member State law.

#### Data Processor

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

#### Data transmission

Making the data available to a specified third party.

#### Indirect data transmission

Transmission of personal data to a data manager or processor performing data management in another third country or in the context of an international organisation by transferring the data to a data manager or processor performing data management in a third country outside the European Union or to a data manager or processor in an international organisation.

#### Disclosure to the public

Making the data available to anyone.

#### Erasure of data

Making data unrecognizable in such a way that it is no longer possible to recover it.

#### Recipient

It means a natural person or legal entity, public authority, agency or another body, to which the personal data are disclosed, whether or not it is a third party. 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

A natural person or legal entity, public authority, agency or body other than the data subject, data manager, data processor and persons who, under the direct authority of the data manager or processor, are authorized to process personal data.

#### The consent of the data subject

A freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by an act expressing his or her unambiguous consent, that he or she gives his or her consent to the processing of personal data concerning him or her.

Objection A statement made by the data subject objecting the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.

#### Privacy incident

A breach of security resulting in an accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data which are transmitted, stored or otherwise managed. (Terms used in this Information Note shall at all times have the meaning given to that term in the GDPR.)

## II. Data management and data protection

The core business activity of NT LLC. is not based on the collection of personal data; we process personal data primarily for the purpose of providing our services to you in accordance with the law and to keep in touch with you.

### II.1. Data manager, data processor related to the use of the website

In respect of this Information Note, the Data Manager is NT Food Production and Trade Limited Liability Company (hereinafter referred to as: the Data Manager or NT LLC.)

- Registered office: H-6100 Kiskunfélegyháza, District VIII., Lot number 04/94.
- Corporate registration number: 03-09-111928
- Tax number: 13351289-2-03
- Website of the company: [www.ntkft.hu](http://www.ntkft.hu); [www.kunsagieden.hu](http://www.kunsagieden.hu)
- E-mail: [info@ntkft.hu](mailto:info@ntkft.hu)

NT LLC. as the Data Manager uses the services of ACG Advertising Agency Limited Liability Company as the data processor (hereinafter referred to as: the "Data Processor"):

- Registered office: H-1027 Budapest, Henger utca 2. Building B,
- Corporate registration number: 01-09-728297
- Tax number: 13301806-2-41
- Website of the company: [www.acg.hu](http://www.acg.hu)

- E-mail: [office@acg.hu](mailto:office@acg.hu)

## II.2. Data management related to the website

A data subject is meant by any natural person who is identified or identifiable, directly or indirectly, on the basis of specific personal data and whose data are managed by the Data Manager. The data subject is therefore primarily the user visiting the website and contacting NT Llc. as the Data Manager or participating in the promotional games (hereinafter referred to as: "the user"). By accessing and using the website, each user accepts all the terms and conditions set out and described in this Information Note.

On the website, the user can enter data in the following ways:

- Personal data explicitly provided or made available when using the services of the website (Article II.2.1)
- Information and data provided in connection with the use of and access to the website (Article II.2.2)

### II.2.1. Management of personal data explicitly provided by the user

#### II.2.1.1. The scope of the data managed

- a) The name, e-mail address, residential address, telephone number and any other personal data explicitly provided by the user when contacting the Data Manager.
- b) Personal data provided when subscribing to the newsletter: name, e-mail address.
- c) In case of promotional games and prize draws, the following personal data may be provided: full name, contact details (e-mail address, telephone number), address (postcode, county, city, street). The requirement to provide any additional personal data appropriate to the nature of the prize draw is set out in the current rules of the game.

#### II.2.1.2. Purpose and legal basis for data management

- a) When contacting participants: the purpose of data management is to maintain contact with users interested in Kunsági Éden edible oil products, to provide information to the user, to handle requests for comments and actions related to the activities of the Data Manager, and to provide information to report any errors in the operation of the website.
- b) In case of subscribing to the newsletter: sending electronic newsletters and advertising messages about offers, services, actions, promotions and competitions related to the Data Manager to the e-mail address provided by the user.
- c) When participating in promotional games and prize draws: the purpose of data management is to run prize draws to promote products, to contact winners, to verify the right to participate in the case of a condition of participation in the game, to publish the name and photo of the winner.

NT Llc. does not perform any profiling in connection with the data management related to the website.

In respect of all data management related to the website listed in Article II.2.1, the user consents to the management of his/her personal data by NT Llc. as described in this Information Note. The legal basis for data management is the prior, voluntary consent of the user pursuant to Article 6 Paragraph (1) (a) of the GDPR.

### II.2.1.3. Duration of data management

a) When contacting the participants: the data management period is limited to up to 30 days from the date of receipt of the message sent by the user by the Data Manager (or, if the user requests the deletion of his/her data or withdraws his/her consent to the management of his/her personal data before that date).

b) In case of subscribing to the newsletter: in case of sending a newsletter, the Data Manager processes the personal data until the withdrawal of the User's consent to receive the newsletter.

c) When participating in a promotional game, prize winning game: the Data Manager shall process the personal data until the prize draw is conducted, the game is suspended/terminated, the user's consent is withdrawn, and the Company shall be responsible for the payment of the tax on the prize, in which case it shall manage the data for 5 years following the year of the tax return.

### II.2.2. Information otherwise collected in connection with the use of this website (cookies)

The Data Manager's website uses anonymous user identifiers (cookies) when using certain services in order to increase the quality of their use and to make it easier for the user. The anonymous user identifier – cookie – is a sequence of signals used by service providers to store unique computer identification or profile information on a user's computer. The sequence of signals itself cannot identify the user personally, it can only be used to recognize their computer. However, not all cookies are essential for the website to operate. Cookies that are not essential but have an additional function are only used with your explicit consent. Full information on the use of cookies can be found in the "Information Note on Cookies" placed on the website.

### II.3. Social media sites on the Website, other external links (Facebook, Instagram, and YouTube)

#### a) Facebook Site of the Data Manager

The Data Manager maintains a Facebook site on the social networking site

<https://www.facebook.com/> (hereinafter referred to as: "Facebook" or "Meta") at

<https://www.facebook.com/kunsagieden/> (hereinafter referred to as: the "Facebook Site").

On the Facebook Site, NT LLC. mainly publishes its articles – anyone can comment on these posts, regardless of their liking of the Facebook Site. In addition, visitors to the Facebook Site have the possibility to contact the Data Manager directly in the form of a Messenger message. The latter data management is governed by this Information Note.

In respect of the Facebook Site, the Data Manager is considered a joint data manager with the operator of Facebook. Facebook is operated by Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA) and is the responsibility of Facebook Ireland Limited (4 Grand Canal Square, Dublin, Ireland) in Europe. Facebook Inc. has subjected itself to the EU-USA Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>).

The Facebook Site operates within the framework of the Facebook Privacy Policy. You can find the Privacy Policy of Facebook here: <https://www.facebook.com/policy.php>.

#### b) The Instagram Site of the Data Manager

The Data Manager maintains an Instagram profile on the social networking site <https://www.instagram.com/> (hereinafter referred to as: “Instagram”) at <https://www.instagram.com/kunsagieden/> (hereinafter referred to as: the “Instagram Site”).

On the Instagram Site, the Data Manager primarily publishes images and posts – these images and posts can be commented on by anyone, regardless of whether or not they follow the Instagram Site. It is not possible to contact the Data Manager directly through the Instagram Site; however, it is possible to contact the respective administrator of the Instagram Site through the Instagram messaging feature. The latter data management is governed by this Information Note.

In respect of the Instagram Site, the Data Manager is considered a joint data manager with the operator of Instagram. Instagram is operated by Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA) and is the responsibility of Facebook Ireland Limited (4 Grand Canal Square, Dublin, Ireland) in Europe. Facebook Inc. has subjected itself to the EU-USA Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>).

The Instagram Site operates under the Instagram Privacy Policy. You can find the Instagram Privacy Policy here: [https:// en-hu.facebook.com/help/instagram](https://en-hu.facebook.com/help/instagram).

#### c) The YouTube Site of the Data Manager

The Data Manager maintains a channel on the video and other content sharing site <https://www.youtube.com/> (hereinafter referred to as: the “YouTube”) at the link <https://www.youtube.com/channel/UC0fx9jzj1WekvJifvLL-Uw> (hereinafter referred to as: the “YouTube Channel”).

On the YouTube Channel site, the Data Manager mainly publishes videos and other content – these posts can be commented on by anyone, regardless of whether or not they follow the YouTube Channel. It is not possible to contact the Data Manager directly via the YouTube Channel, but it is possible to contact the current administrator of the YouTube Channel via the YouTube messaging function. The latter data management is governed by this Information Note.

In respect of the YouTube Channel, the Data Manager is considered a joint data manager with the operator of YouTube. YouTube is operated by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043 United States) and is the responsibility of Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) in Europe.

Google Inc. has subjected itself to the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>).

The YouTube Channel operates within the framework of the YouTube Privacy Policy. You can find the Privacy Policy of YouTube here: <https://policies.google.com/privacy>

#### d) Links

The website also contains links to other websites and webshops. The use of such external websites is governed by the privacy policy and information note of that website, and by clicking on the external link or button, the Data Manager has no control over the collection, storage or management of personal data.

External website links placed on the website:

- Auchan webshop: <https://online.auchan.hu/en/shop/non-perishable-food/oil-vinegar/oil/kunsagieden-100-fine-sunflower-oil-1-l.p22402/690780.v22405>

- Tesco webshop: <https://bevasarlas.tesco.hu/groceries/en-GB/search?query=kuns%C3%A1gi%20%C3%A9den>

- Spar webshop: <https://www.spar.hu/onlineshop/kunsagi-eden-100-finomitott-napraforgo-etolaj-1-l/p/301100003>

- CBA webshop: <https://online.prima.hu/index.php?cmd=search&search=kuns%c3%a1gi+%c3%a9den+%c3%a9tolaj>

#### II.4. User rights

The Data Manager informs the user that the user has the right to exercise his/her rights concerning the management of personal data obtained on the basis of the information note by sending an electronic request to NT LLC. by e-mail to the e-mail address [info@ntkft.hu](mailto:info@ntkft.hu). The Data Manager facilitates the exercise of the user's rights under Articles 15-22 of the GDPR.

NT LLC. shall inform the user of the action taken upon the request without undue delay, but in any event within one month of receipt of the request. If necessary – taking into account the complexity of the request and the number of requests – this deadline may be extended by two additional months. The user will be notified of any extension of the deadline by the Data Manager within one month after the request is received, indicating the reason for the extension. If the data subject has made the request by electronic means, the information shall be provided by electronic means where possible, unless the user requests otherwise.

##### II.4.1. The user's right of access (right to know)

The user has the right to be informed of the personal data managed by the Data Manager and of the information relating to their management, and has the right to access his or her personal data. That is, the user is authorized to receive feedback from the Data Manager as to whether or not their personal data are being managed and, if such data management is taking place, the user has the right to access the personal data and information listed in Article 15 Paragraph (1)(a) to (h) of the GDPR.

##### II.4.2. The right to rectification

The user is authorized to have inaccurate personal data concerning him or her corrected by the Data Manager without undue delay, upon request. Taking into account the purposes of the data management, the data subject shall have the right to have incomplete personal data completed, including also by means of providing a supplementary statement.

##### II.4.3. Right of erasure ("right to be forgotten")

The user shall have the right to have the Data Manager erase the personal data relating to him or her without undue delay, and the Data Manager shall be obliged to erase personal data relating to the user without undue delay. It is mandatory to erase personal data when the personal data are no longer necessary for the purposes for which they were collected or otherwise managed, or when the user withdraws the consent on the basis of which the data were managed and there is no other legal basis for the management. Personal data relating to the user shall be deleted even if the user objects to the data management and there are no overriding legitimate grounds for the data management. The Data Manager shall also erase personal data where the personal data have been unlawfully managed or where the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Manager is subject.

II.4.4. Right to restriction of processing The user has the right to have the Data Manager restrict processing at his or her request if the user contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the Data Manager to verify the accuracy of the personal data. Furthermore, data management should also be restricted if the data management is unlawful and the user opposes the deletion of the data and instead requests the restriction of their use. Where the Data Manager no longer needs the personal data for the purposes of data management, but the data subject requires them for the establishment, exercise or defence of legal claims, it is still necessary to restrict data management. In the case where the user has objected to the data management, the data management shall also be restricted, and, in this case, the restriction shall apply for the period until it is established whether or not the legitimate grounds of the Data Manager prevail over the legitimate grounds of the data subject.

#### II.4.5. The right to data portability

The user has the right to receive personal data concerning him or her that he or she has provided to a data manager in a structured, commonly used, machine-readable format, and the right to transmit those data to another data manager without hindrance from the data manager to whom he or she has disclosed the personal data, where the data management is based on consent or a contract or where the data management is automated. II.4.6. The right to object The user has the right to object at any time, on grounds relating to his or her particular situation, to the management of his or her personal data where the management is carried out for the purposes of the legitimate interests of a third party or for direct marketing purposes.

II.5. Law enforceability related to data management If you believe that your personal data have been compromised by NT Llc., you may lodge a complaint by submitting a written request to the Data Manager or by sending an e-mail to one of the following contact details:

- Postal address: H-6100 Kiskunfélegyháza, District VIII., lot number: 04/94.

- E-mail address: [info@ntkft.hu](mailto:info@ntkft.hu)

You have the right to contact the Authority (address: H-1125 Budapest, Szilágyi Erzsébet Fásor 22/c; tel.: +36 (1) 391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website address: <http://www.naih.hu>) or a court in case of a breach of your rights in relation to the management of your personal data. Any person may lodge a complaint with the Authority on the grounds that a personal data management incident or imminent threat thereof has occurred. The detailed provisions on further legal remedies in the case of recourse to the courts are set out in Act V of 2013 on the Civil Code (the "CC") and the rules of civil procedure, and in the case of recourse to the data protection authority in the Infotv.

If you turn to court to have your personal data protected, the court will bring a decision in the case out of turn. In this case, you are free to choose whether to bring your action before the courts having jurisdiction for the place where you reside (permanent address) or stay (temporary address) or before the courts having jurisdiction for the place where the Authority is located. You can contact the tribunal court in your place of residence or domicile at <http://birosag.hu/ugyfelkapcsolati-portal/birosag>. The competent court according to the seat of the Authority is the Metropolitan Tribunal Court of Budapest.

**We recommend that you file a complaint with NT Llc. as a first step before initiating any other proceedings. We reassure you that we will respond to your complaint with the utmost care, involving the Data Protection Officer, within one month and will endeavour to resolve your problem in a satisfactory manner.**



## II.6. Data transmission

The Data Manager is authorized and obliged to transmit to the competent authorities any personal data at its disposal and stored by it in accordance with the law, which it is required to transmit by law or by a final administrative decision. The Data Manager cannot be held liable for such data transmission and the consequences thereof.

In addition, the personal data processed by the Data Manager may be accessed by the Data Processor named in Article II.1 of this Information Note, in addition to the user.

## II.7. Who can access the personal data processed by NT Llc.?

All employees of NT Llc. are bound by confidentiality obligations. NT Llc. places emphasis on ensuring, through internal regulations and IT rights management, that the data it processes is only known to those employees whose job is related to the personal data in question.

## II.8. Data security at NT Llc.

NT Llc. puts a great emphasis on ensuring that the risk-proportionate protection of personal data it manages or processes is ensured, i.e. that there is no breach of data security resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise handled (privacy incident). NT Llc. has the state-of-the-art technical means to reduce the risk of data protection incidents in a risk-proportional way (virus protection, IT border protection, access rights management, regular updating of the operating system, etc.).

In the event that, despite all these, a data protection incident occurs, NT Llc. has an internal data protection policy, which sets out the detailed rules for the management of personal data, including the investigation of incidents, the involvement of the Data Protection Officer, the notification of data subjects and the National Authority for Data Protection and Information Security (the Authority), as well as the documentation of incidents and their immediate handling.

The Data Processor shall contractually guarantee the security of the personal data in its possession. When selecting the data processor, the primary consideration was that the partner should offer adequate guarantees in terms of data security.

NT Llc. ensures the data protection awareness of its employees through data protection training, thus facilitating the prevention and proper handling of data protection incidents, whether IT or non-IT related.

II.9. Availability of this Information Note on Data Management You can view this Information Note on Data Management outside of our website at the guard service at our registered office, or you can ask either our Data Protection Officer or a member of our staff who is in contact with you to arrange for you to have a paper copy of the Information Note.

Kiskunfélegyháza, 7 January, 2021

NT Élelmiszertermelő és Kereskedelmi Kft. – NT Food Production and Trade Llc.