

# DATA MANAGEMENT INFORMATION

consolidated as amended on 16 December 2024

For our company, Gamax Ltd., the lawfulness of the processing of personal data and the protection of personal data are of paramount importance. The purpose of this information notice is to provide information on our data processing activities in accordance with the applicable data protection regulations, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as GDPR).

*If you have any further questions about this notice or the processing of your personal data already provided, please contact us at any time using one of the contact details below.*

## **I. THE DATA CONTROLLER**

In relation to the processing described in this notice, the controller is:

**Gamax Kft.** (registered office: 1114 Budapest, Bartók Béla út 15/d. II/18., company registration number: 01-09-067822, court of registration: Fővárosi Törvényszék Cégbírósága, tax number: 10383571-2-43) (hereinafter "Gamax" or "we" or "our")

How to contact us for questions about data management:

postal address: 1114 Budapest, Bartók Béla út 15/d. II/18.

e-mail account: [adatvedelem@gamax.hu](mailto:adatvedelem@gamax.hu)

phone: 30-743-34-06

website: [www.gamax.hu](http://www.gamax.hu)

Electronic access to the Privacy Notice:

[https://gamax.hu/documents/Data\\_Management\\_Information\\_Gamax.pdf](https://gamax.hu/documents/Data_Management_Information_Gamax.pdf)

## **II. OUR DATA MANAGEMENT**

### **1. EMPLOYEE DATA MANAGEMENT**

#### **1.1. "Own" workers (i.e. workers not employed on a temporary basis)**

We provide detailed information about the processing of personal data of persons employed by our company in a separate document for reasons of volume. Our Privacy Notice is available to data subjects at our headquarters and premises and on our internal computer system.

#### **1.2. Temporary agency work - workers employed on a temporary basis**

In the course of temporary agency work, personal data is processed concerning the personal data of the employees who have entered into an employment relationship with us for the purpose of the temporary agency work. The details of this are set out in a separate information notice, which is available here: [https://gamax.hu/documents/Data\\_Management\\_Information\\_Manpower\\_Leasing\\_Gamax.pdf](https://gamax.hu/documents/Data_Management_Information_Manpower_Leasing_Gamax.pdf)

The processing of personal data of our leaser partners and other cooperating partners is subject to the provisions of section 4 of this notice.

#### **1.3. Job vacancies**

We also provide information on the processing of applicants' personal data when applying for the jobs we advertise in a separate document available here:

[https://gamax.hu/documents/Data\\_Management\\_Information\\_Manpower\\_Recruitment\\_Gamax.pdf](https://gamax.hu/documents/Data_Management_Information_Manpower_Recruitment_Gamax.pdf)

### **2. SOFTWARE LOCALISATION AND TRANSLATION**

Our company also provides software localisation and software translation. In the context of these activities, it is not typical that the product being localised or translated contains personal data, but if it

does contain personal data, our company, as a data processor, processes it on the basis of the customer's instructions. Information on the processing of these personal data is therefore provided to the data subjects in the customer's data processing information.

The processing of the personal data of our customers and subcontractors is governed by the provisions of point 4 of this notice.

### **3. SOFTWARE DEVELOPMENT AND MANAGEMENT, SERVER SERVICES**

With regard to the processing of personal data, our company also acts as a data processor when it provides server services and may also process personal data in the course of software development and software operation. As a data processor, we act on the instructions of the data controller, and the processing of data is explained in our customers' data processing information.

In connection with software development and operation, the handling of personal data of our customers and subcontracting partners involved in the performance of the service is governed by the provisions of Section 4 of this information.

### **4. CONCLUSION AND PERFORMANCE OF CONTRACTS**

This section applies to contracts entered into in the course of our business, i.e. contracts that we enter into with our principals or subcontractors, collaborators, suppliers. Employment contracts are not covered by this clause.

#### What is the purpose of the processing?

If our contractual partner (whether on the client or supplier side) is a natural person or a sole trader, the purpose of processing your personal data is to establish, register and perform the contract.

If our contracting partner is a company or an individual / natural person, but a contact person (also) acts on his/her behalf, the purpose of processing the contact person's personal data is to ensure the smooth establishment, performance and termination of the contract.

If there is an obligation to issue an invoice in relation to the contract and our contracting partner is a natural person or a sole trader, the data relating to the invoice issued on the basis of the contract, the purpose of the processing of which is to fulfil our accounting obligations as defined by law (issuing invoices, keeping invoices), are also personal data.

In the case of a natural person or an individual contractor, the purposes of data processing in the context of the performance of the contract also include the settlement of any warranty and guarantee claims and other disputes.

#### What personal data do we process for the above purposes?

For natural persons and self-employed contracting parties:

- name and identification of the service requested, quantity, price;
- order, date of contract, status;
- data relating to the performance of the subject matter of the contract (place, time and date of performance, confirmation of performance);
- Invoice details (name and address of the contracting party, invoice number, date, date of execution, payment deadline, gross and net amount, VAT amount, discounts and discounts, etc.);
- payment details (date of payment, amount, method of payment, bank account number of the contracting partner in case of bank transfer);
- reported warranty and guarantee claims, the content of the report on the claim, the method and date of fulfilment of the claim.

For both natural persons and business contracting parties:

- contact person's identity and contact details (name, surname, first name, telephone number, e-mail address, position, name of company/person represented);

#### On what legal basis and for how long do we process this personal data?

In the case of a contract with a natural person or an individual entrepreneur, we need their personal identification and contact details in order to conclude and perform the contract, so the provision of

these details is a prerequisite for the conclusion of the contract. The legal basis for processing these data is the **performance of the contract** pursuant to Article 6(1)(b) of the GDPR. These data are processed in principle during the general tax law limitation period (5+1 years) and are deleted after expiry of this period without a specific request.

In addition, in the case of a natural person or an individual contractor, certain personal data **are processed on the basis of the following legal obligation** (Article 6(1)(c) GDPR):

- in the event of an obligation to issue or retain an invoice, we must process the invoicing data (invoice name and address, invoice details) in accordance with Act C of 2000 on Accounting (Act on Accounting) and we are obliged to retain the documents issued in connection with the contract, together with the data contained therein, for 8 years in accordance with Section 169 of the Act on Accounting;
- if our client is subject to VAT, we are obliged to indicate the tax number of the customer or service user on the invoice pursuant to Section 169 (d) (dc) of Act CXXVII of 2007 on Value Added Tax (hereinafter: VAT Act), the retention period of the tax number is based on the retention period of the invoice;
- in the case of consumer contracts, we are obliged to keep a record of the reported claim for 3 years in accordance with the Decree 19/2014 of the National Ministry of Agriculture and Forestry.

We process your contact details in accordance with Article 6(1)(f) of the GDPR **for our legitimate interest in the smooth performance of the contract**, during the limitation period (5 years) for the performance of the contract and the related claims. In the event of a change of contact person, the data of the previous contact person will be deleted at the same time as the change is transferred.

## 5. CUSTOMER SERVICE DATA MANAGEMENT, CONTACTING

### What is the purpose of the processing?

If you contact us with a query (contacting us), we will process the personal data you provide in a message, e-mail, postal letter or telephone call in order to contact you and respond to your query.

This item covers requests for information. If the correspondence relates to the preparation of a contract or to a contract that is in progress or has been performed, the details of that type of processing will apply to that contact.

### What personal data do we process for the above purposes?

In case of an e-mail request:

name, e-mail address, other personal data provided by the interested party (including in particular the contact details of the interested party or other data subject and the circumstances of the matter with which the interested party has contacted us)

In the case of telephone enquiries, the following data will be processed:

name, telephone number, date and time of the conversation, personal data provided by the enquirer (including in particular the contact details of the enquirer or other person concerned and the circumstances of the matter with which the enquirer has contacted the customer service)

For letters sent by post:

the name and address of the sender, the date of delivery of the letter, other personal data provided by the interested party (including, in particular, the contact details of the interested party or other data subject and the circumstances of the matter with which the interested party has contacted us).

For messages sent via the contact form on the website:

first name, last name, e-mail address, telephone number, company name, selected service, message content

### On what legal basis do we process your personal data?

We process the personal data of the data subject processed in accordance with this point for the **purposes of our legitimate interest** in recording and responding to the data subject's request and settling the resulting claims, pursuant to Article 6(1)(f) of the GDPR.

### How long do we keep your personal data?

Personal data (including e-mails) processed in connection with enquiries will be deleted after the purpose for which they were processed has ceased to exist. Thus, if the e-mail and the response to it are

not expected to be needed for further administration or claims, they will be deleted immediately, otherwise the request and the response will be deleted after they are no longer needed for these purposes.

### **III. WHO CAN KNOW YOUR PERSONAL DATA?**

Personal data will be treated confidentially. The personal data we process may be accessed by our employees who need to know it in order to perform their job duties, and by our data processors and their employees in connection with the tasks they perform. These persons are also required to treat the personal data they receive as confidential.

Our data processors and their tasks:

The data processor	Activities carried out by the processor in relation to the processing
name: Címer 2010 Könyvelő Kft. head office: 1114 Budapest, Bartók Béla út 15/D. Contact: cimerkft@gmail.com	Activity: accounting, invoicing services Personal data collected: possible personal data (name, address), payment data, contained in the invoices or contracts provided to you.
Name: HR-FACE Ltd. head office: 8000 Székesfehérvár, Sereghelyesi út 113. Contact: www.hr-face.hu	Activity: payroll Data collected: employee data required for payroll
name: Novitax Ltd. head office: 1105 Budapest, Gitár u. 4. Contact: www.novitax.hu	Activity: operation of the invoicing software we use. Data collected: possible personal data (name, address) on the invoices
Name: e-Corvina Ltd. head office: 1134 Budapest, Róbert Károly körút 64-66. Contact: www.e-corvina.hu	Activity: development and operation of DocPortal software Data collected: data stored in DocPortal software
name: ARRABONA-WORK Ltd. seat: 9165 Cákóháza, Fő utca 41.	Activity: operation of abuse reporting software Data collected: personal data collected in the course of operating the software

We reserve the right to involve additional data processors in the future, which we will inform you of by amending this notice.

We disclose personal data to **courts, prosecutors and other authorities** in the context of our legal obligations, to the extent and in the manner required by law.

In the event of a **legal claim** against you, your personal data may also be disclosed to the extent necessary for the enforcement of the claim by our respective legal cooperation partners and our claims management partners.

EXPERT" Auditing and Consulting Limited Liability Company (HU-2500 Esztergom, Révész Béla utca 7.), which carries out **the audit for Gamax Kft.**, and its employees are entitled to inspect the documents of Gamax Kft. and to make and process copies necessary for the audit. In this context, the audit firm is entitled to process personal data solely for the purpose of performing its audit-related activities, to the extent and for the duration necessary for this purpose.

### **IV. DATA SECURITY**

We are committed to taking the necessary data security measures. In this context, we adopt and implement, and regularly review, technical and organisational measures and procedures to ensure the security of the personal data we process, and we will do our utmost to prevent the destruction, unauthorised use or alteration of the data, to ensure that the personal data we process cannot be accessed, disclosed, transmitted, modified or deleted by unauthorised persons. We remind all those to whom we transfer personal data to comply with the requirements of data security.

In the context of the above, information technology solutions are designed and selected to ensure that those who have access to the data have exclusive access to the data and that the data remain authentic and unaltered. This includes, but is not limited to, password protected access systems, activity logging, regular back-ups and back-ups.

We always keep abreast of technological developments, apply the available technical, technological and organisational solutions and apply solutions that meet the level of protection justified by our data management.

## **V. HANDLING DATA BREACHES**

A data breach is any incident whereby personal data is accessed by an unauthorised person or is destroyed, lost or altered, for example, if the database is destroyed or the storage medium on which the data is stored is lost.

In the event of a data breach, we will assess the impact and risks (what data is affected, how much, whether it can be recovered, etc.) and take the necessary steps to remedy the situation without delay. If we are unable to address the risks, we will report the incident to the data protection authority within 72 hours of becoming aware of the incident and we will publish information about the incident on our website. We also keep records of data breaches in the detail required by law.

## **VI. YOUR RIGHTS**

**RIGHT OF ACCESS** : At any time, you can use the contact details provided in point I to ask us whether we are processing your personal data and, if so, to provide you with further information about:

*the purposes of the processing, the legal basis for the processing, the personal data we process, the categories of personal data we process, the recipients or categories of recipients (including data processors we use) to whom or which we have disclosed or will disclose the personal data (in the case of transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the transfer, the duration of the storage of the data, the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data relating to him or her and to object to the processing of such personal data, the right to lodge a complaint with the NAIH, the source of the data, the circumstances of the possible personal data breach, its effects and the measures taken to remedy it*

We will also provide you with a copy of the personal data we hold about you together with the information. The first copy is free of charge, but we are entitled to charge a reasonable fee for each additional copy based on our administrative costs. The amount of this charge will be communicated to you in advance.

**RIGHT OF CORRECTION AND ADDITION** : If you become aware that any of your personal data is incorrect, inaccurate or incomplete, please provide us with the correct or additional information as soon as possible so that we can make the correction or completion.

**RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")** : You have the right to request the erasure of your personal data. Please note that we may refuse to erase your data in particular if we need or may need it to comply with a legal obligation or to pursue a claim.

In the case of processing based on legitimate interest, objection to the processing shall entail the erasure of the data, unless there are overriding reasons why erasure cannot be carried out.

Cancellation is also possible if

- a) the data are no longer necessary for the original purpose of the processing;
- b) the processing of the data is unlawful;
- c) we are required to delete it by European Union or national law.

**RESTRICTIONS ON DATA PROCESSING RIGHT TO ACCESS:** In the course of the processing, you may request the restriction of processing if (i) you contest the accuracy of the personal data, in which case the restriction will apply for the period of time that allows us to verify the accuracy of the personal data; (ii) the processing is unlawful but you oppose the erasure of the data and instead request the restriction of their use; (iii) we no longer need the personal data for the purposes of processing but you request it for the establishment, exercise or defence of legal claims; (iv) you have objected to processing based on our legitimate interests, in which case the restriction applies for a period of time until it is determined whether the legitimate grounds prevail over your legitimate grounds.

In the case of restriction, we will only store the data and will not perform any other operations on it, unless you consent to further processing or unless such further processing is necessary to protect your rights, the rights of a third party or is in the public interest.

In the event of a restriction of processing, you will be informed in advance of its lifting.

**RIGHT TO OBJECT:** in relation to processing based on our or a third party's legitimate interests, you may object to our processing if you consider that the processing is prejudicial to you.

In the event of an objection, personal data will be deleted unless there is an overriding reason to keep it. Such an overriding reason may be if we wish to pursue a claim against you.

**RIGHT TO DATA PORTABILITY:** in relation to the processing of your personal data in connection with our contracts with you, you may request that the personal data you provide to us be provided to you or another person you designate in a commonly known and easily usable electronic format.

## **VII. SUBMITTING AND RESPONDING TO REQUESTS**

If you wish to exercise any of the above rights, please send your request in writing to [adatvedelem@gamax.hu](mailto:adatvedelem@gamax.hu) or by post to Gamax Kft. 1114 Budapest, Bartók Béla út 15/d. II/18. In the letter, please include your personal identification details and postal address. If we have any doubts about your identity or if the information provided is not sufficient to identify you, we are entitled to ask you for additional identification data.

Your request will be fulfilled within 1 month. If necessary, we are entitled to extend this period by a further 2 months and will send you a reasoned decision.

**Valid requests will be granted free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are entitled to charge a reasonable fee or even refuse to act on the request.**

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At your request, we will inform you of the recipients to whom we have communicated or informed as described above.

## **VIII. COMPENSATION, DAMAGES**

If we cause damage to you or to another person by unlawful or unsecure processing of your personal data, you or the person who has suffered damage may claim against us.

If your privacy rights are violated in this way, you are entitled to claim damages.

Please note that we are not liable to pay compensation or damages if the damage can be proven to have been caused by an unavoidable external cause outside the scope of data management or if the damage is the result of your intentional or grossly negligent conduct.

## **IX. HOW TO CLAIM**

## *1. Contacting the data controller*

If you consider that we are not acting lawfully in processing your personal data, please first communicate your comments or requests to us as the data controller using one of the contact details indicated in Section I. in order to enable us to process and handle your comments as quickly and efficiently as possible.

## *2. Contacting the data protection authority, making a complaint*

In the event of unlawful data processing, you are also entitled to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

Contact details of the NAIH:

Website: <http://www.naih.hu/>  
address: 1055 Budapest, Falk Miksa utca 9-11.  
postal address: 1363 Budapest, Pf.: 9.  
e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## *3. Go to court*

You are also entitled to pursue your claim in court. Certain courts have jurisdiction to hear the case. You can bring your claim before the court where we are based or before the court where you live or reside.

Budapest, 13 December 2024.

**Gamax Ltd.**  
data controller

## INTEREST SCREENING TEST

### CONTRACTUAL CONTACT DETAILS

Subject of processing: contact details provided by our business partner

Personal data: Name, telephone number and e-mail address of the contact person under the contract, position, name of the person represented

Purpose of processing: To maintain the necessary contacts for the performance of contractual obligations, the enforcement of rights and the performance of the contract.

Legitimate interest: To facilitate the effective performance of the contract by the controller.

Legitimate interest Legal basis: article 6(1)(f) GDPR

Rights of the person concerned,

which may be compromised: identification of the natural person on the basis of other data; protection of privacy

Interest assessment: **Contacts:** it is in the common interest of the contracting parties to fulfil their contractual obligations as efficiently as possible, and to ensure the effectiveness of cooperation and coordination in relation to the fulfilment of the contract. In the context of contract performance, it may be necessary to contact the parties. The contact persons are normally the employees of the contracting parties and the contact details provided are their company contact details at which they are required to be available during working hours in the course of their duties.

**Guarantees:** The data controller processes the data subject's data solely for the purpose of fulfilling the contract.

The confidentiality provisions of the contract also bind the company.

Only authorised persons have access to the data.

Conclusion: On the basis of the above, the data controller considers that it has a legitimate interest in processing the data of the contractual contacts and that this legitimate interest is not overridden by the rights and freedoms of the individual.

Budapest, 15 May 2019.

**Gamax Ltd.**  
data controller

**INTEREST SCREENING TEST  
FOR CUSTOMER SERVICE DATA PROCESSING**

**Subject of processing:** contacting the data controller for other purposes than contractual

**Personal data:** In the case of an e-mail request, the contact person who contacted us name, e-mail address, other personal data provided by the interested party (including in particular the contact details of the interested party or other data subject and the circumstances of the matter with which the interested party has contacted us)

If you contact us by phone, the person who contacts us will:  
the name, telephone number, date and time of the conversation, personal data provided by the enquirer (including in particular the contact details of the enquirer or other person concerned and the circumstances of the matter with which the enquirer has contacted the customer service)

**For letters sent by post:**

the name and address of the sender, the date of delivery of the letter, other personal data provided by the interested party (including, in particular, the contact details of the interested party or other data subject and the circumstances of the matter with which the interested party has contacted us).

**Purpose of processing:** To contact us, receive, record and answer questions

**Legitimate interest:** Responding to enquiries, handling claims.

**Legitimate interest Legal basis:** article 6(1)(f) GDPR

**Rights of the person concerned:** privacy

**Interest assessment:** In cases falling within the scope of customer service activities, the data subject is the one who initiates the contact and voluntarily provides personal data. It is in the interest of the data subject to receive a response to his/her request, for which it is indispensable to receive and register the request and to record the personal data necessary to reply.

**Guarantees:** The controller processes personal data only to the extent necessary to fulfil the request. The data will only be accessed by those authorised to do so and the necessary security and organisational measures will be taken to ensure the confidentiality of the data.

**Conclusion:** On the basis of the above, the data controller considers that it has a legitimate interest in processing the personal data contained in the requests, and that the legitimate interests are not overridden by the rights and freedoms of the individual.

Budapest, 15 May 2019.

**Gamax Ltd.  
data controller**