### WEBSITE

# PRIVACY INFORMATION

Visual Europe Limited Liability Company collects and processes personal data in the course of operating the website ("Website") available at https://vegroup.hu. By publishing this notice, the operator aims to ensure that data subjects are fully informed about the purposes, methods, principles and security measures of the processing, in particular to enable them to make an informed choice about the use of the services available on the Website and to give their consent to the processing.

For the purposes described above, we provide the following information in compliance with our obligation under Regulation 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 Regulation (EC) No 95/46/EC (hereinafter "the Regulation").

### (1) Definition of Data Controller

The controller of the personal data set out below is Visual Europe Zártkörűen Működő Részvénytársaság (Company Registration Number: 10-10-020321, Tax Number: 25319721-2-10, postal address: 2151 Fót, Telkes Mária út 7., Email: info@vegroup.hu, telephone: +36 (70) 380 6265 - "Data Controller")

# (2) Contact person

The Data Controller does not have a Data Protection Officer. For data protection matters, the Data Controller's representative can be contacted directly at the following contact details: Visual Europe Zrt., address: 2151 Fót, Telkes Mária út 7., Email: info@vegroup.hu, telephone: +36 (70) 380 6265

### (3) Principles to be observed when processing personal data

1. The Data Controller shall process personal data lawfully and fairly and in a transparent manner for the data subject ("lawfulness, fairness and transparency").

The Data Controller shall collect personal data only for specified, explicit and legitimate purposes and shall not process them in a way incompatible with those purposes (**"purpose limitation"**).

The Data Controller processes only the data that are strictly necessary for the purposes for which the data are processed ("data minimisation").

The Data Controller shall endeavour to keep the personal data processed accurate and up to date and shall take all reasonable steps to delete or rectify without undue delay any personal data that are inaccurate for the purposes for which they are processed ("accuracy").

The Data Controller shall process personal data held by it only for the time necessary to fulfil the purposes for which the data are processed (**"storage limitation"**)

The Data Controller shall ensure the security of personal data, including the protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("integrity and confidentiality"), by implementing appropriate technical and organisational measures in the processing of personal data.

The Data Controller is responsible for compliance with the above and must be able to demonstrate such compliance (**"accountability"**).

### (4) General rules on data processing

- 1. The Data Controller shall process personal data only in accordance with the rules laid down in the Regulation (Article 6 (1) of the Regulation):
  - (a) where the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes (voluntary consent);
  - (b) where the processing is necessary for the performance of a contract to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into that contract (performance of a contract);

- (c) where the processing is necessary for compliance with a legal obligation to which the Data Controller is subject (legal obligation);
- (d) where processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or a third party (legitimate interest).
- 2. In the case of processing based on voluntary consent, data subjects may withdraw their consent at any stage of the processing.
- 3. In cases where the processing of the personal data provided, including the transmission of the data, is required by law, the Data Controller shall also specifically inform the data subject thereof.

# (5) Personal data processed by the Data Controller and definition of processing

Description of the data processing	Data processing in relation to the operation of the Website
Purpose of processing	To operate the Website and provide the services available on the Website to users.
Legal basis for processing	Article 6(1)(f) GDPR: legitimate interest of the Data Controller in the use of cookies and IP addresses.
Data subjects	Users and visitors of the Website
Scope of personal data	(i) IP identifier, (ii) Cookie IDs:  - Mobile Advertising ID - technical identifier in Mobile Application Environment, e.g. smartphone operating systems, - Other data collected about users' interaction with advertising and digital interfaces (websites, mobile applications): - the type of browser used by the user and its settings; information about the operating system of the user's device; cookie identifiers and other identifiers defined for the device; IP addresses; information about the user's interaction and activity with websites and mobile applications, including the time of interaction or activity, the specific web address and search terms entered in the search engine; information about the approximate geographic location of the device (city, region, postal code) when accessing the website or mobile application, obtained from the decomposed IP address information or GPS data.
Special category of data	-
Data storage	The hosting service is provided by Servergarden Kft. (Head office: 1139 Budapest, Váci út 99-105. Balance Building 3 <sup>rd</sup> floor, Email: info@servergarden.hu) on its own servers.
Duration of data processing	For cookies and IP identifiers, as set out in the cookie notice, but for a maximum of 18 months after the last activation - see cookie notice for details.
Access to data	Employees involved in the operation of the Website.
Recipients of data transfers	The member companies of the Visual Europe Group:  (i) VISUAL EUROPE POLSKA sp. z.o.o (OGRODOWA str, nr 58, WARSZAWA, post code: 00-876, POLSKA, REGISTRATION NUMBER /KRS number/ 0000966732)  (ii) Visual Europe Czechia s.r.o. (Malešická 2855/2b, Žižkov, 130 00 Praha 3, TAX NUMBER 17479037)  (iii) Visual Europe Adria d.o.o. (Dunajska cesta 136, Ljubljana, 1000 SL, REGISTRATION NUMBER: 9211705000)

	(iv) Visual Europe Spain s.l. (Calle Villalar 7., Bajo Izquierda, 28001, Madrid, Spain, TAX NUMBER (NIF) B10722023)
Description of the technical and organisational measures taken to ensure the security of data processing	The following measures shall ensure the necessary and appropriate level of complex information security with regard to confidentiality, integrity and availability:  (i) complex administrative and technical protection measures (internal data protection policy, other mandatory policies including data management),  (ii) regular monitoring of data management processes and continuous customisation of protection measures based on a continuous risk analysis, as well as a data processing contract with data processors providing appropriate guarantees,  (iii) personal security measures,  (iv) information and training of data controllers, raising awareness of the need for data protection
Possible consequences of not providing data	Incomplete use of the services of the Website, inaccuracy of analytical measurements.

Description of the data processing	2. Newsletter
Purpose of processing	Regularly informing the recipient (subscribed data subject) about the latest promotions, events and news of the Data Controller, essentially sending regular advertising. To record the date of subscription and unsubscription for the purpose of event administration.
Legal basis for processing	Article 6(1)(a) GDPR: consent given by the data subject
Data subjects	Any natural person who wishes to be regularly informed about news, promotions and discounts of the Data Controller and Visual Europe Group and therefore subscribes to the newsletter service by providing his/her personal data.
Scope of personal data	(i) name - for identification purposes, (ii) e-mail address - for identification purposes and for sending the newsletter (iii) technical data: date of subscription and unsubscription - for future reference.
Special category of data	-
Data storage	The hosting service is provided by Servergarden Kft. (Head office: 1139 Budapest, Váci út 99-105. Balance Building 3rd floor, Email: info@servergarden.hu) on its own servers.
Duration of data processing	Active (sending) newsletter database: the data will be deleted until the data subject unsubscribes or, if the Data Controller requests confirmation of consent, after the expiry of the deadline for confirmation.
Access to data	Employees involved in the operation of the Website.
Recipients of data transfers	In principle, no transfer of data will take place, except to a public authority or court if required by law.
Description of the technical and organisational measures taken to ensure the security of data processing	The following measures shall ensure the necessary and appropriate level of complex information security with regard to confidentiality, integrity and availability:  (i) complex administrative and technical protection measures (internal data protection policy, other mandatory policies including data management),

	(ii) regular monitoring of data management processes and continuous customisation of protection measures based on a continuous risk analysis, as well as a data processing contract with data processors providing appropriate guarantees, (iii) personal security measures, (iv) information and training of data controllers, raising awareness of the need for data protection
Possible consequences of not providing data	The providing of the data is an essential condition for sending the newsletter, without it the sending is not possible.

Description of the data processing	3. Requesting for proposal, contacting us
Purpose of processing	Providing the possibility to contact and request a proposal
Legal basis for processing	directly.  Article 6(1)(b) GDPR, 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,  Article 6(1)(f) GDPR, legitimate interest of the Data Controller to facilitate business contacts.
Data subjects	Natural persons initiating contact and/or requesting an offer on their own behalf or as a representative.
Scope of personal data	Name, e-mail address.
Special category of data	-
Data storage	The hosting service is provided by Servergarden Kft. (Head office: 1139 Budapest, Váci út 99-105. Balance Building 3 <sup>rd</sup> floor, Email: info@servergarden.hu) on its own servers.
Duration of data processing	Until the end of the calendar year following the year in which the offer is received.
Access to data	Employees involved in the operation of the Website.
Recipients of data transfers	The member companies of the Visual Europe Group:  (i) VISUAL EUROPE POLSKA sp. z.o.o (OGRODOWA str, nr 58, WARSZAWA, post code: 00-876, POLSKA, REGISTRATION NUMBER /KRS number/ 0000966732)  (ii) Visual Europe Czechia s.r.o. (Malešická 2855/2b, Žižkov, 130 00 Praha 3, TAX NUMBER 17479037)  (iii) Visual Europe Adria d.o.o. (Dunajska cesta 136, Ljubljana, 1000 SL, REGISTRATION NUMBER: 9211705000)  (iv) Visual Europe Spain s.l. (Calle Villalar 7., Bajo Izquierda, 28001, Madrid, Spain, TAX NUMBER (NIF) B10722023)
Description of the technical and organisational measures taken to ensure the security of data processing	The following measures shall ensure the necessary and appropriate level of complex information security with regard to confidentiality, integrity and availability:  (i) complex administrative and technical protection measures (internal data protection policy, other mandatory policies including data management),  (ii) regular monitoring of data management processes and continuous customisation of protection measures based on a continuous risk analysis, as well as a data processing contract with data processors providing appropriate guarantees,  (iii) personal security measures,  (iv) information and training of data controllers, raising awareness of the need for data protection
Possible consequences of not providing data	The providing of the data is a necessary condition for the data subject to be able to send a message through the website.

Description of the data processing	4. Job application
Purpose of processing	Evaluating the application file, preparing the interview and (in case of a successful application) preparing the conclusion of the employment contract.  The Data Controller will provide detailed information on data processing after contacting the applicant at the feedback session. Thereafter, data processing will not be carried out via the Website.
Legal basis for processing	a) Article 6(1)(a) GDPR, consent of the data subject, b) in the case of a successful application, Article 6(1)(b) GDPR, 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.
Data subjects	Natural persons applying for a job and/or initiating contact.
Scope of personal data	<ul><li>(i) contact details,</li><li>(ii) personal information in the CV, motivation letter.</li></ul>
Special category of data	-
Data storage	The hosting service is provided by Servergarden Kft. (Head office: 1139 Budapest, Váci út 99-105. Balance Building 3 <sup>rd</sup> floor, Email: info@servergarden.hu) on its own servers.
Duration of data processing	The Data Controller will delete the data immediately after the contact, but after a maximum of 30 days.  The data subject will be informed separately about the processing of data related to the further course of the application, which is not part of the operation of the Website.
Access to data	Employees involved in the operation of the Website.
Recipients of data transfers	The member companies of the Visual Europe Group: (v) VISUAL EUROPE POLSKA sp. z.o.o (OGRODOWA str,
	nr 58, WARSZAWA, post code: 00-876, POLSKA, REGISTRATION NUMBER /KRS number/ 0000966732) (vi) Visual Europe Czechia s.r.o. (Malešická 2855/2b, Žižkov, 130 00 Praha 3, TAX NUMBER 17479037) (vii) Visual Europe Adria d.o.o. (Dunajska cesta 136, Ljubljana, 1000 SL, REGISTRATION NUMBER: 9211705000) (viii) Visual Europe Spain s.l. (Calle Villalar 7., Bajo Izquierda, 28001, Madrid, Spain, TAX NUMBER (NIF) B10722023)
Description of the technical and organisational measures taken to ensure the security of data processing  Possible consequences of not	nr 58, WARSZAWA, post code: 00-876, POLSKA, REGISTRATION NUMBER /KRS number/ 0000966732) (vi) Visual Europe Czechia s.r.o. (Malešická 2855/2b, Žižkov, 130 00 Praha 3, TAX NUMBER 17479037) (vii) Visual Europe Adria d.o.o. (Dunajska cesta 136, Ljubljana, 1000 SL, REGISTRATION NUMBER: 9211705000) (viii) Visual Europe Spain s.l. (Calle Villalar 7., Bajo Izquierda,

# (6) Details of the technical and organisational measures taken to ensure the security of the processing of personal data

- 1. The Data Controller's computer systems and other data storage devices are located at its headquarters and at its data processors.
- 2. The Data Controller shall select and operate the IT tools used to process personal data in the course of providing the service in such a way that the processed data is accessible to those authorised to access it (availability); its authenticity and authentication are ensured (authenticity of processing); its integrity can be verified (data integrity) and it is protected against unauthorised access (data confidentiality).
- 3. The Data Controller shall protect personal data by means of complex administrative and technical protection measures (IT security policy, internal data protection policy, other mandatory rules concerning data management), in particular against unauthorised access, alteration, disclosure, publication, deletion or destruction, accidental destruction, damage and inaccessibility due to changes in the technology used.
- 4. The Data Controller shall manage the electronically processed data files in its various registers in such a way that the stored data cannot be directly linked and attributed to the data subject, except where permitted by law.
- 5. The Data Controller shall ensure the safety of data processing, taking into account the state of the art, by means of technical and organisational measures that provide a level of protection appropriate to the risks associated with the processing, which ensures the (i) confidentiality (protecting information so that only those who are authorised to access it have access to it), (ii) integrity (protects the accuracy and completeness of the information and the method of processing), (iii) availability (ensuring that when the authorised user needs it, he has effective access to the information and the means to obtain it).
- 6. The Data Controller's IT system and network are protected against computer viruses, computer intrusions and other attacks. The operator shall ensure security through server-level and application-level protection procedures. Its data processors shall undertake to maintain these technical conditions at all times in their processing contracts with the Data Controller.

### (7) Rights of data subjects

1. The data subject may request information about the processing of his or her personal data, and may request the rectification, erasure or withdrawal of his or her personal data, except for mandatory processing, and exercise his or her right to data portability and objection in the manner indicated when the data were collected, or by contacting the Data Controller at the contact details provided in Chapters (1) and (2) of this privacy policy. Any change in personal data or request for the deletion of personal data may be communicated by means of a statement sent from the registered e-mail address or by post. Changes to certain personal data may also be made by modifying the personal profile page.

## (8) Enforcement options

- 1. The data subject may address any questions or comments directly to the Data Controller using the contact details indicated in Chapter (2) of this Privacy Policy.
- 2. The right to take legal action: the data subject may take the Data Controller to court in the event of a breach of his or her rights.
- 3. Without prejudice to other administrative or judicial remedies, any data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes the GDPR.

In Hungary

Nemzeti Adatvédelmi és Információszabadság Hatóság

Cím: 1055 Budapest, Falk Miksa utca 9-11.

Levelezési cím: 1363 Budapest, Pf. 9.

Telefon: +36 (1) 391-1400 Fax: +36 (1) 391-1410 www: http://www.naih.hu

e-mail: ugyfelszolgalat@naih.hu

### In Spain AEPD

Address: C/Jorge Juan, 6 28001 Madrid, Spain

Telephone: +34 901 100 099 / +34 91 266 35 17

Website: www.aepd.es

### In Czech Republic

The Office for Personal Data Protection

Pplk. Sochora 27, 170 00 Praha 7 Czech Republic

Phone information: +420 234 665 800 Phone switchboard: +420 234 665 111

### In Slovenia

Informacijski pooblaščenec Dunajska cesta 22, 1000 Ljubljana, Slovenija

Tel: 01 230 97 30 E-pošta: gp.ip@ip-rs.si

Prijava kršitev: navodila in obrazec

#### In Poland

Urząd Ochrony Danych Osobowych ul. Stawki 2, 00-193 Warszawa

Tel: 22 531-03-00

e-mail: kancelaria@uodo.gov.pl

Infolinia: 606-950-000