



Debreceni Infrastruktúra Fejlesztő Kft.
4025 Debrecen, Széchenyi utca 31.
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Internal data processing and privacy policy

Debreceni Infrastruktúra Fejlesztő Kft.
Become operative: 23 November 2018

I. Introduction

Debreceni Infrastruktúra Fejlesztő Kft. informs you about usage of the website. The following overview provides a brief introduction to how personal data is handled at the website of Debreceni Infrastruktúra Fejlesztő Kft. This Policy describes organisational and technical measure of the data protection, rights of the data processing, options of law validation.

II. The data controller:

Name: Debreceni Infrastruktúra Fejlesztő Kft.

Location and postal address: 4025 Debrecen, Széchenyi utca 31.

Registry authority: Hajdú-Bihar Megyei Cégbíróóság

Registration number: 09 09 030264

VAT number: 26583361-2-09

E-mail: info@dif.debrecen.hu

Website address: <https://dif.debrecen.hu>

Name of hosting provider: Opendevel Kft.

Address of hosting provider: 4031 Debrecen István út 65. 5/16

III. Directive on privacy used by the data controller

- a)** The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th 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 Directive 95/46/EC (hereinafter referred to as the “General Data Protection Regulation” or “GDPR”) shall apply.
- b)** Law L. of 2013 on safety of electronic information of governmental and municipal entities
- c)** Law V. of 2013 on the Civil Code
- d)** Law I. of 2012 on the Labour Code
- e)** Law CXII. of 2011 on the right to self-determination as regards information and freedom of information
- f)** Law XXXVI of 1994 on Police
- g)** Law CXXXV. of 1995 National Security Services.
- h)** Law CLV. of 2009 on protection of qualified data
- i)** Law XX of 1996 on identifying methods replacing identification number and on usage of identification codes

IV. Definitions

1. „Personal data”: Means 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.

2. „Processing”: 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

3. „Limit of data processing”: Indication of the stored personal data are in order to limit of processing

4. „Profiling”: Means 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;

5. „Pseudonymisation”: Pseudonymisation is 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.

6. „Filing system”: Means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;

7. „controller”: 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 controller or the specific criteria for its nomination may be provided for by Union or Member State law;

8. „processor”: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

9. „recipient”: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the 4.5.2016 EN Official Journal of the European Union L 119/33 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;

10. „third party”: means 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 authorized to process personal data;

11. „consent of the data subject”: means 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;

12. „personal data breach”: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

V. Principle relating to processing of personal data

1. Lawfulness, fairness and transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject by the controller

2. Purpose limitation

Personal data is only for specified, explicit and legitimate purposes, and must not be treated in a manner which is incompatible with these purposes.

3. Data minimization

Processing shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4. Accuracy

Data must be accurate and up to date in case of need. The controller needs to do every reasonable step which 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.

5. Storage limitation

Data shall be 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. Storage of personal data for a longer time is only possible in specific cases, in which the procession is intended for public archiving, scientific, historical or statistical research according to 1st Paragraph of Article 89 of GDPR regulation, taking into account the proper technical and organizational execution of measures required for the protection of rights and freedoms of stakeholders.

6. Integrity and confidentiality

Processing shall be happened in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures

7. Accountability

The controller shall be responsible for, the personal data processing which need to be legitimate, and be able to demonstrate compliance with this legality

VI. Stakeholders

Stakeholders of data procession are the visitors of Webpages operated by Data Controller, persons asking for advice or information on the Webpage and candidates applying for accessible open positions.

VII. Processed data:

Request of counselling through a website: all the following information, such as name, address, e-mail address, phone number, text of the request are processed by the Data Controller.

The data processed of the website users: By using this website, you consent to the use of cookies. Cookies are files that store information on your hard drive or Web browser.

The data of applicant for the open position: All the following information are processed by the Data Controller: name at the birth, place of birth, date of the birth, phone number, e-mail address, address, document of recognition of the qualifications, cv with or without photo, demand for gross payment.

VIII. Aim of data procession:

In case of counselling asked through Webpage, the aim of data procession is recording and confirmation of relevant data and performance of the counselling.

Cookies used during operation of Webpage: cookies enable the Webpage to recognise You if You have already visited it. Cookies help us to understand which part of the Webpage is the most popular, because they let us know which pages our visitors log in and how much time they spend there. By studying this, we can adapt the Webpage to your demand and offer You a more diversified experience of using it.

Recording of data of candidates applying for open positions: procession, administration of application forms, cv incoming for advertised open job opportunities or for recording to electronic database, in the aim of recruitment and selection.

IX. Legal basis of data procession:

In the case of counselling required through Webpage, the name, e-mail address of the stakeholder, description of the problem, address, in relation to the counselling, the legal basis of data procession is point b) of 1st Paragraph of Article 6 and Ektv. 13/A. These data are necessary for the performance of counselling. Without these data the counselling cannot be accomplished.

Legal basis of the data procession in the case of cookies installed on the computer of user through the Webpage: in the case of those cookies which are technically necessary for the operation and the using of services and functions offered by the Webpage: Ektv. 13/A and b: point of the 1st paragraph of Article 6 of Regulation.

In the case of recording the data of applicants to open positions: The legal basis of data procession is the consent of the stakeholders. Although, giving personal data in Curriculum Vitae is not based on law, it is a requirement of the concluding of contract, without it Data Controller is not able to decide in the question of contacting the candidate in the aim of starting interviews.

X. Duration of data procession

In case of counselling asked through Webpage: the data of stakeholders are processed by Data Controller until the withdrawal of the storage of data.

Data Controller processes the data in connection with Curriculum Vitae for 3 years from the date of their incoming.

XI. Safety of personal data

During data procession and storage, Data Controller guarantees the safety of processed and stored data with proper measures for the level of technique. Processed and stored data are protected from access, alteration and modification by incompetent persons.

Data Controller provides the proper level of protection during data procession.

XII. The rights of data subjects

1. The data subject is entitled for the right of information. The data subject is entitled for the right of Information about processing of personal data. The data subject has the right to erasure, withdraw and rectification of personal data, except of the compulsory data processing. Changes in personal data or demand of deleting personal data can be stated at registered e-mail address or in written statement expressed by fully evidentiary private document sent by postal letters.
2. Right for information: The Organization takes proper measures in the aim of providing the stakeholders with all the information mentioned in Articles 13 and 14 of GDPR in connection with personal data procession. According to Articles 15-22 and 34 all the information should be formulated in a brief, clear, accessible and transparent way. Practising the right for orientation can be sent in written form to the address of Debreceni Infrastruktúra Fejlesztő Kft. or to the e-mail address adatvedelem@dif.debrecen.hu. According to the request of stakeholder – after justification of personal identity – information can be given in an oral way, too.
3. Right of access by the data: The data subject shall have the right to obtain from the controller 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:
 - the purposes of the processing;
 - the categories of personal data concerned
 - categories of addressee or addressees who were informed or will be informed about personal data, especially addressees from third country and international organizations.
 - the envisaged period for which the personal data will be stored;
 - right of correction, deletion or the right of limiting data processing and protesting
 - the right to lodge a complaint with a supervisory authority;
 - information about sources of data

- the fact of automatized decision-making, including profile creating and information about applied logics and about the importance and possible consequences of data processing from the aspect of the stakeholder.

Information can be asked in a written form in postal way or electronically via e-mail sent to the address of „adatvedelem@dif.debrecen.hu”. Information asked via e-mail can only be considered genuine if it is sent from a registered e-mail address of the Partner.

4. In case of personal data forwarded to third country or to international organization, the stakeholder is entitled to receive information about proper guarantees of data forwarding.
5. The Organization makes available the copies of processed personal data to the stakeholder. According to the request of the stakeholder, the Organization provides data electronically. Data Controller gives information from the date of presentation of the plea in maximum 1 month.
6. Right to rectification: The data subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her. The data subject shall have the right to have incomplete personal data completed. Stakeholders can ask the Organization to correct and complete incorrect or incomplete data concerning them. If personal data does not match reality and correct data is available, Data Controller corrects it.
7. Right to erasure: The data subject is entitled automatically for the right to erasure. The Data Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
 - the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
 - the personal data have been unlawfully processed;
 - the personal data must be erased for compliance with a legal obligation in Union or national law to which the controller is subject
 - collection of personal data is happening in connection with offering services related to information society
 - the data subject is entitled for the right to object, in relation to the processing based on public powers or legitimate interests;After the performance of demand to deletion or modification of personal data, deleted data cannot be reconstructed.
8. Deletion of data cannot be initiated, if data procession is necessary according to any of these reasons: necessary for the performance of obligations required by the union or state member rights in connection with Data Controller and processing personal data; or necessary for presenting, endorsing and protecting of legal demands of the Organisation.

- 9. Right to restriction of processing:** The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
- 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
 - the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
 - 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;
 - the stakeholder protested against data processing; in this case limitation refers to the duration until it is stated that the legal reasons of Data Controller have precedence over legal reasons of stakeholder.
- 10.** If data procession is under limitation, personal data – except for storing of it - can only be processed with the contribution of the stakeholder or in the aim of presenting, endorsing and protecting legal demands or rights of other natural or legal persons. The Organization informs stakeholders about the release of limitation of data procession.
- 11. Right to data portability:** The data subject is entitled for the right to data portability in relation to the processing based on a contract or consent, if the processing is carried out by automated means; the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used format and have the right to transmit those data to another controller
- 12. Right to protesting:** Stakeholders are entitled to protest anytime against the publication of their personal data for reasons in connection with their own situation. In case of protest, Data Controller must not make public personal data, except if it is explained by compulsory legal measures, which have precedence over the interests, rights and freedoms of stakeholder or which are in connection with presentation, endorsement or protection of legal demands.
- In addition, stakeholders can exercise their right of protesting if data processing is happening directly with the aim of marketing. Stakeholder is entitled to protest anytime against processing of related data happening for this reason, including profile creating, if it is directly in connection with marketing. In case of protest against data processing with the direct reason of marketing, data must not be used for this reason.
- 13. Automated decision-making in unique cases, including profile creating:** Stakeholders are entitled to not being subject of decisions - based on only automated data procession, including profile creation, which would have legal effect on them or would concern them to a reasonable extent. This entitlement is not applicable if data procession:
- is necessary for conclusion or performance of contract between the stakeholder and data controller
 - is possible according to those union or state member rights about data controller, which state legal measures for protecting the rights, freedoms and legal interests of stakeholders or
 - is based on the clear contribution of the stakeholder.
- 14. Right of withdrawal:** the data subject is entitled for the right to withdraw the existence of the consent right at any time, without affecting the lawfulness of processing based on consent before its

withdrawal.

Name of the data protection officer: Debreceni Infrastruktúra Fejlesztő Kft., postal address: 4025 Debrecen, Széchenyi street 31, e-mail address: adatvedelem@dif.debrecen.hu

The data officer shall provide information on action taken on a request to the data subject without undue delay and in any event within 30 days of receipt of the request.

When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is already proven. The controller shall provide information on action taken on a request to the data subject without undue delay and in any event within 30 days of receipt of the request. That period may be extended by sixty further days where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within 30 days of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

In case of lag or complaint of the action you have the right to turn to a court in any cases of infringement of the rights of a data subject. The data subject is entitled for the right to lodge a complaint with a supervisory authority (Hungarian National Authority for Data Protection and Freedom of Information, hereafter: Authority or NAIH)

The data subjects may contact the Hungarian National Authority for Data Protection and Freedom of Information (address: 1150 Budapest, mailbox:5, phone number: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu) directly with their complaints regarding their data processing.