

## **PRIVACY POLICY**

This Privacy Policy ensures compliance with the rules of the GDPR of the European Union (Regulation 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free processing of such data, and repealing Directive 95/46/EC). This Privacy Policy should be read in conjunction with the General Data Protection Policy of the Jelinkó Valéria Individual Enterprise (hereinafter referred to as the "Data Controller"), which contains the general principles of data processing.

This Privacy Policy applies to our processing of your personal data. Purpose of data processing:

- to provide you with accounting and tax advisory services,
- to answer any questions you ask,
- to keep in touch with us.

### **What personal data do we process?**

Among other things, we process the following personal data:

- surname, first name, titulous;
- contact details (mailing address, email address, phone number);
- data required for personal identification (tax identification number/tax number, social security number, identity card and/or passport data);
- data related to your interactions with us;
- the requests, questions, complaints and the answers given to them;
- information about your expectations and preferences;
- information about the consents you have given to us for data processing and how to withdraw them.

### **1. Who processes your data and how?**

#### **Data Controllers:**

**Jelinkó Valéria Individual Enterprise (Company Registration Number: 13-11-090994; seated at H-2049 Diósd, Álmos Fejedelem utca 1/C.) is your accounting service provider and tax advisor in Hungary.**

We ensure that your data is not used for marketing purposes or to send you unnecessary information, but only for information that is valuable and useful to you.

**To evaluate and improve the quality of our services, to protect the reputation of our services**

To select our customers, to better meet their needs, to fully optimize our services and to better inform our customers.

To ensure proper operation and the good reputation of our services by sending reminders and tax newsletters on request.

**The maintenance and development of our IT system and compliance with the regulations on data security** are the legitimate interest of the Data Controller in order to ensure its proper operation.

(Article 6(1)(f) of the GDPR)

**To provide evidence in legal proceedings, to bring evidence against us in the case of claims, protection is in the** legitimate interest of the Data Controller.

(Article 6(1)(f) of the GDPR)

**Processing of your personal data**

To keep your personal data up to date, correct, keep in order, to keep you in touch with you in case of problems with fulfilling your customer requests, to update and correct your personal data that is available to us.

The management of your personal consents and the enforcement of client requests and customer rights are the legitimate interests of the Data Controller.

(Article 6(1)(f) of the GDPR)

**Taking** the steps necessary prior to the conclusion of the contract based on your interest in the service, and the data processing necessary for taking the steps prior to the conclusion of the contract are the legitimate interest of the Data Controller.

(Article 6(1)(b) of the GDPR)

**2. Performance of the contract**

Accounting services in accordance with the rules of the Accounting Act (Act C of 2000, Hungary) and the fulfilment of tax return, data reporting and reporting obligations based on the concluded contract(s).

(Article 6(1)(b) of the GDPR)

**Keeping in touch and measuring customer satisfaction**

Keeping contact with you, contacting you after contacting you to request consent to data processing for service purposes is the legitimate interest of the Data Controller.

(Article 6(1)(f) of the GDPR)

### **3. Recipients of the data transfer**

Your data will be processed by the National Tax and Customs Administration (Company Registration Number: **01-08-000001**; at Budapest, Széchenyi tér 2.) processed as a data processor based on your request/authorisation.

The recipients of your personal data may include:

- 1.** National Tax and Customs Administration
- 2.** National Bank of Hungary
- 3.** Hungarian Central Statistical Office
- 4.** Local governments (for local taxes)

and other organisations of these organisations, which may provide services or participate in data processing in the field of various IT services and archiving services for specific purposes in the course of their core activities.

We may transfer your information to countries outside the EEA, including the United States, Japan and the United Kingdom, where you have consented to or are capable of (i) achieving any of the purposes set out in this Privacy Notice, and (ii) the transfer of your information is in accordance with this Privacy Notice.

If your personal data is transferred outside the EEA, we will ensure that your personal data is protected by the following safeguards:

- the law of the country to which we transfer your data ensures an adequate level of data protection (Article 45 of the GDPR); or
- the transfer is subject to general data protection clauses approved by the European Commission (Article 46(2) of the GDPR) or binding corporate rules (Article 47 of the GDPR).

### **4. Contact us**

For matters related to the protection of personal data, you can contact us at the [info@jelinko.hu](mailto:info@jelinko.hu) e-mail address.

### **5. Duration of data processing:**

We process your personal data for the following period:

- for the period necessary for the performance of the service and for the enforcement or defence of related claims, or for 8 years from the end of the year prescribed for the submission of tax returns;

### **Compliance with legal obligations**

The documentation of the service provided or the contract performed for accounting purposes or due to tax obligations is the legal obligation of the Data Controller

(Article 6(1)(c) of the GDPR)

- in the case of contracting, for 10 years from the end of the year in which the contract was concluded;

- in the case of providing an offer that is of interest to you, for a period of 6 months from the date of your enquiry or visit;
- if the data processing is carried out in order to comply with legal requirements, then for the period prescribed by the relevant legislation.

**6. The source of the data is** exclusively the data and documents provided by you.

## **7. Your rights in relation to data processing**

You have the right to receive information about the processing of your data and the recipients of the data transfer. You also have the right to rectification, deletion, restriction of processing, objection to processing, objection to profiling and withdrawal of your consent to processing. The withdrawal of consent does not affect the lawfulness of the previous data processing.

Data processing for advertising purposes does not take place at the Data Controller.

## **8. Right to lodge a complaint**

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint with the Hungarian Data Protection Authority: National Authority for Data Protection and Freedom of Information (postal address: 1055 Budapest, Falk Miksa utca 9-11.; e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); Tel: +36 (30) 683-5969) or you can file a lawsuit with the court of your place of residence (residence). The parties shall settle any disputes in the first instance by amicable negotiation. In case of failure to do so, the competence of the Conciliation Board operating at the Pest County Chamber of Commerce and Industry will be elected.

## **9. Right to object**

You have the right to object to the processing of your data at any time if the legal basis for doing so is contrary to your legitimate interests.

## **10. Data Protection Officer**

If you have any questions about the processing of your data, you can contact our Data Protection Officer or you have the right to withdraw your consent to the processing at any time by sending a letter to the following address:

E-mail: [info@jelinko.hu](mailto:info@jelinko.hu) /data processing/.