

## PRIVACY POLICY

The purpose of this Privacy Policy is to let you learn about all the important information with regard to the processing of your personal data by Recycling Market Kft., as the operator running the portal at [www.recytrader.com](http://www.recytrader.com) (hereinafter: Portal). This Privacy Policy is the privacy policy referred to in the General Terms and Conditions of Service (GTCS) (<https://recytrader.com/documentdownloadbyid/1>). Terms not defined in this Privacy Policy have the meaning defined in the GTCS.

The purpose of this Privacy Policy is to provide information to our Users on the processing of their personal data and their rights guaranteed in relation to the processing of those data by the General Data Protection Regulation (GDPR) of the European Union and Act CXII of 2011 on the Right of Informational Self-Determination and on the Freedom of Information (hereinafter: Infotv.).

### 1. Definitions:

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.

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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Pseudonymisation means 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.

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.

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 authorised to process personal data.

Joint control means where two or more controllers jointly determine the purposes and means of processing.

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.

Special categories of personal data mean personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

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.

### 2. Controller:

With regard to every item of recorded data, the Controller is **Recycling Market Kft.** (registered office....., Trade Registration No. Cg....., represented by: .....). In the course of this activity, the Controller does not make use of any data processors.

### 3. What data are processed and why?

Registration in the portal is a process consisting of three parts, in the course of which the natural person user registers on the home page of the portal (<https://recytrader.com>), in the course of which the user states:

- (i) the exact name and tax number of the company on behalf of which he or she wishes to register,
- (ii) the user's e-mail address, and

(iii) the password attached to the e-mail address, with which he or she will be able to log into the application thereafter.

Of your personal data, we process your full name, phone number, e-mail address and electronic identifier, IP address as contact data.

**The purpose of data processing** is to maintain contact with you, to enter into contract online and to administer online trading in the portal.

**The legal basis for data processing** is your specific consent expressed in your statement of consent made in the course of registration on the website at [www.recytrader.com](http://www.recytrader.com) operated by Recycling Market Kft., and the legitimate interest of Recycling Market Kft., as Controller to enforce its legal claims arising in relation to the content uploaded by you, or eventually against you or others on account of your behaviour, or to use the data in defence of its legal claims while enforcing the legal claims enforced by others against it on account of your behaviour. Your data are processed in accordance with 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 Directive 95/46/EC (General Data Protection Regulation), and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.).

#### **4. What organisational and safety measures are applied to protect your data?**

Only those employees of the Controller have access to your data who are responsible for data processing. The Controller processes your personal data in the portal which is protected by password and encryption and it does not make the data available in other IT systems.

#### **5. How long are your data processed?**

The purpose of obtaining the data and the nature of the data determine how long we retain your personal data. We keep your personal data only as long as they are needed for meeting the objectives presented in this Privacy Policy, unless legal regulation allows for a longer period of storage. When we no longer need your personal data, we can destroy them securely, in time and consistently. Under special circumstances, we may store your personal data for a longer period of time in order to be able to keep accurate records of your steps in the event of your eventual complaint or claim, or when in warranted cases we believe that litigation could be initiated in relation to your personal data or procedure.

#### **6. What rights are you entitled to?**

- a) Right to information concerning data processing and the data processed (right of access, GDPR Article 15),
- b) Right to rectify inaccurate data or to supplement deficient data (right to rectification, GDPR Article 16),
- c) Right to request erasure of personal data, or if personal data were made public, the right to have the Controller inform other controllers of the request to erase (right to erasure, GDPR Article 17),
- d) Right to request the restriction of processing (right to restriction of processing, GDPR Article 18),
- e) Right to receive personal data in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller (right to data portability, GDPR Article 20),
- f) Right to object to processing of the data with a view to stopping the processing of the data (right to object, GDPR Article 21),
- g) Right to withdraw your consent with a view to stopping data processing pursued on the basis of your consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal (right to withdraw consent, GDPR Article 7). You may withdraw your consent to the processing of your data at any time and you may request the restriction of the use of your data: you can do this by terminating your registration. Recycling Market Kft. will continue to process your data even in case you withdraw your consent, if it is obligated to do so by legal regulation (for instance, in the case of contractual relationships), or if it enforces a legal claim against you or others in relation to the content you uploaded, or somebody else enforces a legal claim against it because of your behaviour.

#### **7. Subscription to the newsletter:**

If you wish to subscribe to our newsletter, you may do so in our website (<http://www.recytrader.com>) by completing the form there. If you complete the registration form and make your personal data available to us and consent to us sending you a newsletter, you will receive an e-mail from us to the e-mail address given by you. In order to finalise your subscription to the newsletter, you will have to click on the "Confirmation of subscription" link in the e-mail you receive. The processing of the personal data given in the registration form takes place exclusively in order to send the newsletter to your e-mail address in the event that you give your consent to the processing of your data. The legal

basis of processing is GDPR Art. 6 (1) a) and Infotv Art. 5 (1) a). We store your personal data for the purpose of sending you the newsletter only until you unsubscribe by clicking on the “unsubscribe” link. You will find this link at the bottom of each newsletter you received from us. If you unsubscribe, your personal data will be erased without undue delay. Please note that following the erasure of your personal data, you will not receive any other newsletter or coupon from us.

## **8. Cookies and tracking**

## **9. How you may access information concerning your personal data?**

You may request information from us concerning what personal data are processed, for what purpose and in what way, and you may request a copy of the personal data that we process. These requests will be met free of charge. Your rights of determination and of access can only be guaranteed following prior identification precisely in order to protect your data. Therefore, we request you to make your requests, statements or complaints in relation to the processing of your personal data in an e-mail sent from your registered e-mail address given in the portal addressed to ..... @ e-mail address, or in a message sent from the profile used upon registration, or if these are not possible for any reason whatsoever, then send them to us to the above e-mail address or by phone No. .... . In the latter case, it will be necessary to verify your personal identity in order to enable you to exercise your rights. In addition, you may lodge a petition with the Fővárosi Törvényszék [Budapest Tribunal] (1055 Budapest, Markó u. 27. Mailing address: 1363 Budapest, Pf. 16.) or the competent tribunal according to your residence, or you may contact the Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information] (1135 Budapest, Szilágyi Erzsébet fasor 22c, www.naih.hu) on account of a breach of your rights related to your right to informational self-determination or the illegal processing of your personal data. We reserve the right to regularly amend this Privacy Policy. In the event of any amendment, the current version will be uploaded to this website; we will also modify the date of the version at the bottom of the page. We recommend you to regularly review this privacy policy and obtain information of our data protection practice.

The date of the last modification of this Privacy Policy is 15 May 2018.