

## DATA PROCESSING NOTICE

### Contractual relationships Data processing of contracts

**Effective date: 15/10/2025**

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (Info Act) (EU) 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 Directive 95/46/EC (GDPR - General Data Protection Regulation), we hereby inform you about the processing of the personal data you have provided:

#### 1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

#### 2. The data processed

##### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Name, title, address (if applicable), and other identifying information of the company representative	Contract conclusion, contract fulfillment, accounting, invoice fulfillment, invoicing	Necessary for the performance of a contract - GDPR Article 6(1) paragraph (b)	The data provided in the contract is stored by the Data Controller for the entire duration of the contract, and for 8+1 years after the termination of the contract.  If the document cannot be disposed of according to the archiving and disposal instructions, the personal data contained therein will not be deleted.

##### Related legislation

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##### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

##### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

##### The source of the personal data processed:

The data subject

**The data will be transmitted:**

Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Kiss-Tóth Könyvelő Kft. 1149 Budapest, Nagy Lajos király útja 108. Accountant, Dunaelektronika Kft. 1183 Budapest Gyömrői út 99. External system administrator, IT service provider, Magyar Telekom Nyrt. 1097 Budapest Könyves Kálmán krt. 34-36 Telecommunications service provider(s), Google Inc 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland Mail system, Google workspace, Google services, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Mailing system, HRP Europe Kft. 1033 Budapest, Huszti út 34. ERP system operator, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Microsoft Dynamics NAV (formerly Navision) ERP system, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Office 365 software (word, excel, etc.)
<i>Recipients</i>	Flex Audit Kft. 1223 Budapest, Kápolna utca 25/A I.em.4. Auditor - if applicable

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Google Inc,USA,Privacy Policy Data Privacy Framework, <a href="https://policies.google.com/privacy?hl=hu&amp;fg=2">https://policies.google.com/privacy?hl=hu&amp;fg=2</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> , <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> , <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage,

**Joint processing takes place:**

Answer	Name and registered seat of the joint controller
No	

**Access to data and data security measures:**

<b>Restricting access</b>	Only those employees have access to personal data who are in absolute need of this information to perform their duties. Typically, the manager, finance, or management can access the data. The enterprise ensures this through authorization management.
<b>Data security measure</b>	Alarm, Unauthorized person cannot enter the office Key management - rights management Closed document storage, closed archive Security camera system Safe deposit box Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Private use of IT equipment is prohibited Employee confidentiality agreement signed It is mandatory to turn off the screen when the employee leaves their workstation Employees must immediately report the loss or damage of IT devices and data carriers to their superior or a designated person It is mandatory to keep documents that are not in use during work in a locked place.

Victofon Hallásjavító Kft. 1068 Budapest, Szondi u. 98/a. fszt.2.

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website: <https://victofon.hu/hu>

telephone: +36 30 311 4123



	Password protection of applications and software Two-factor authentication for logging into certain software
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### 3. Rights of the Data Subject:

#### Rights of data subjects relating to the legal basis and an explanation of these rights

Right to information: The Data Subject has the right to be informed about the way in which personal data are processed before the processing starts

Right of rectification: The Data Subject has the right to request the rectification of his or her personal data if the personal data held by the Controller are inaccurate and he or she can prove this

Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her

The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form

Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal implication on the Data Subject.

### 4. Exercise of data subject rights

Where the data subject has made a request to the controller in relation to the exercise of his or her rights as described in point 3, the controller shall respond without undue delay, but no later than one month from the receipt of the request, and inform the data subject of the action taken on the request. If necessary, this period may be extended by a further two months.

If the Controller fails to act on the data subject's request, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial redress.

### 5. Lodging a complaint

The data subject has the right to lodge a complaint with the data protection authority:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Seat</b>	H-1055 Budapest, Falk Miksa utca 9-11.
<b>Postal address</b>	1363 Budapest, Pf.9.
<b>Email</b>	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	<a href="http://naih.hu">http://naih.hu</a>

### 6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

## DATA PROCESSING NOTICE

### Contractual relationships Data management of contact persons

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	telephone	+ 06 30 311 4123
	website	<a href="https://victofon.hu/hu">https://victofon.hu/hu</a>
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

#### 2. The data processed

##### Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Name Position Telephone number Email address	Communication related to the performance of a contract	Legitimate interest - Article 6(1)(f) GDPR	The data provided in the contract is stored by the Data Controller for the entire duration of the contract, and for 8+1 years after the termination of the contract.

##### Related legislation

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##### Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

##### Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

*If so, the Data Subject has the right to request manual, human intervention.*

##### The source of the personal data processed:

The data subject  
employer of the data subject

**The data will be transmitted:**

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Category	Company name, registered seat, activity
<i>Processors (performing technical tasks related to data processing operations)</i>	Kiss-Tóth Könyvelő Kft. 1149 Budapest, Nagy Lajos király útja 108. Accountant, Dunaelektronika Kft. 1183 Budapest Gyömrői út 99. External system administrator, IT service provider, Magyar Telekom Nyrt. 1097 Budapest Könyves Kálmán krt. 34-36 Telecommunications service provider(s), Google Inc 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland Mail system, Google workspace, Google services, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Mailing system, HRP Europe Kft. 1033 Budapest, Huszti út 34. ERP system operator, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Microsoft Dynamics NAV (formerly Navision) ERP system, Microsoft Corporation One Microsoft Way Redmond, Washington 98052 Office 365 software (word, excel, etc.)
<i>Recipients</i>	

**Data is transferred to a third country (outside the EU):**

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Google Inc,USA,Privacy Policy Data Privacy Framework, <a href="https://policies.google.com/privacy?hl=hu&amp;fg=2">https://policies.google.com/privacy?hl=hu&amp;fg=2</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> ,  <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage, Microsoft Corporation,USA,Terms of Service and Privacy Policy Data Privacy Framework, <a href="https://privacy.microsoft.com/hu-hu/privacystatement">https://privacy.microsoft.com/hu-hu/privacystatement</a> ,  <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> ,possible access by parent company, data storage,

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<b>Data security measure</b>	Alarm, Unauthorized person cannot enter the office Key management - rights management Closed document storage, closed archive Security camera system Safe deposit box Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Private use of IT equipment is prohibited Employee confidentiality agreement signed It is mandatory to turn off the screen when the employee leaves their workstation Employees must immediately report the loss or damage of IT devices and data carriers to their superior or a designated person

	It is mandatory to keep documents that are not in use during work in a locked place. Password protection of applications and software Two-factor authentication for logging into certain software
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Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her

Right to object: If the legal basis is on the grounds of legitimate interest or public authority, the data subject may object to the processing of his or her personal data, but the objection does not imply the immediate erasure of his or her data

Right to restriction: If the Data Subject does not consider the Controller to be entitled to process his or her personal data, he or she may request the suspension of the processing during the investigation

The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form

Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal implication on the Data Subject.

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Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage

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website: <https://victofon.hu/hu>

telephone: +36 30 311 4123

suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

The logo for Victofon, featuring the word "Victofon" in a bold, red, sans-serif font.