

PRIVACY POLICY

I. NAME AND DETAILS OF THE DATA CONTROLLER

Company name:	Fresssh Facility Services BV
Seat:	The Netherlands, 5211BM 's-Hertogenbosch Stationsplein 91-105.
Registration no:	82827982
Registering authority:	Holland Chamber of Commerce
Email:	fresssh@hema-group.eu
Phone:	+36 30 406 2285 (job opportunities); +31 6 3932 4274 (cooperation)

II. TYPES OF DATA PROCESSING

II.1. Contact, communication, request for a quote

The Data Controller provides the opportunity for individuals to contact them through a contact form placed on their website, or through any other contact methods listed on the website, or via the Data Controller's Facebook page, for the purpose of further information or requesting a quote. For this purpose, the Data Controller handles personal data as follows:

Scope of processed personal data	last name, first name, email address, phone number, content of the message
Purpose of data processing	contact, communication, providing information, requesting a quote
Legal basis of data processing	<ul style="list-style-type: none">consent of the data subject [GDPR Article 6(1)(a)], which the data subject expresses on the appropriate section of the contact form used on the Data Controller's websiteLegitimate interest of the Data Controller related to the proper provision of services [GDPR Article 6(1)(f)]
Duration of data storage	the Data Controller stores personal data for the time necessary to achieve the purpose of data processing, up to the obligation of deletion or for a maximum of six months (whichever occurs first)
Recipients	UNAS Online Kft.; Éva Szeberényi sole trader; Gábor Papp sole trader
Rights of the data subject	right of access, right to rectification, right to erasure, right to restriction of processing (see the content of these rights below)

II.2. Applying for a job

The Data Controller provides the opportunity for individuals to contact them through a contact form placed on their website, or through any other contact methods listed on the website, or via the Data Controller's Facebook page, for the purpose of applying for a job or expressing interest in job-related inquiries. For this purpose, the Data Controller handles personal data as follows:

Scope of processed personal data	last name, first name, email address, phone number, content of the message and the content of the CV sent by the data subject
Purpose of data processing	contact, communication, providing information
Legal basis of data processing	<ul style="list-style-type: none">consent of the data subject [GDPR Article 6(1)(a)], which the data subject expresses on the appropriate section of the contact form used on the Data Controller's websiteLegitimate interest of the Data Controller related to the proper provision of services [GDPR Article 6(1)(f)]

Duration of data storage	the Data Controller stores personal data for the time necessary to achieve the purpose of data processing, up to the obligation of deletion or for a maximum of six months (whichever occurs first)
Recipients	UNAS Online Kft.; Éva Szeberényi sole trader; Gábor Papp sole trader
Rights of the data subject	Right of access, right to rectification, right to erasure, right to restriction of processing (see the content of these rights below)

II.3. Contractual communication

The Data Controller maintains contact with the individuals designated in their contracts with customers, partners, and employees. For this purpose, the Data Controller controls personal data as follows:

Scope of processed personal data	last name, first name, email address, phone number, job position
Purpose of data processing	communication for the purpose of contract performance
Legal basis of data processing	in the case of a contractual partner who is not a natural person, the Data Controller has a legitimate interest related to the performance of the contract (GDPR Article 6(1)(f)). In the case of a natural person, the legal basis is the performance of the contract (GDPR Article 6(1)(b))
Duration of data storage	Until the expiration of the limitation period according to the applicable law governing the contract after its termination
Recipients	UNAS Online Kft.
Rights of the data subject	Right of access, right to rectification, right to erasure, right to restriction of processing (see the content of these rights below)

II.4. Accounting obligation

In accordance with the relevant legislation, the Data Controller is obligated to retain accounting documents directly and indirectly supporting the accounting records, including general ledger accounts, analytical or detailed records, in a readable format and retrievable manner for up to 7 years. For this purpose, the Data Controller processes personal data as follows:

Scope of processed personal data	last name, first name, email address, phone number, description of ordered service, fee for ordered service
Purpose of data processing	fulfillment of the legal obligation to retain accounting documents directly and indirectly supporting the accounting records
Legal basis of data processing	fulfillment of legal obligations applicable to the Data Controller (GDPR Article 6(1)(c))
Duration of data storage	in order to fulfill the legal obligation to retain accounting documents, 7 years
Recipients	Annamária Szabó sole trader
Rights of the data subject	Right of access, right to rectification, right to erasure, right to restriction of processing (see the content of these rights below)

III. SECURITY OF PERSONAL DATA

The Data Controller and data processors are entitled to access the personal data of the data subject to the extent necessary to perform their job duties. The Data Controller takes all necessary security, technical, and organizational measures to ensure the security of the data.

III.1. Organizational measures

The Data Controller provides access to its IT systems with user-specific permissions. When allocating access, the principle of "necessary and sufficient rights" is applied, meaning that every user of the Data Controller's IT systems and services may only use them to the extent necessary for their tasks, with corresponding permissions, and for the required duration. Access rights to IT systems and services are granted only to individuals who, for security or other reasons (e.g., conflict of interest), are not subject to restrictions and possess the professional, business, and information security knowledge necessary for their secure use.

The Data Controller and the data processors undertake strict confidentiality obligations in writing and are obligated to act in accordance with these confidentiality rules during their activities.

III.2. Technical measures

The Data Controller and the data processor store the data on their own devices.

The Data Controller and the data processor protect their internal network with multi-level, firewall-based security measures. Hardware firewalls (border protection devices) are installed at all entry points of the employed public networks. The Data Controller and the data processor redundantly store the data - that is, in multiple locations - to protect against destruction, loss, alteration, and unauthorized destruction resulting from IT equipment failure.

The Data Controller and the data processor protect their internal networks from external attacks with multi-level, active, complex malware protection (e.g., antivirus).

The Data Controller and the data processor make every effort to ensure that their IT equipment and software continuously comply with generally accepted technological solutions in the market.

During development, the data processor establishes systems where operations can be controlled and monitored through logging, enabling the detection of incidents such as unauthorized access.

IV. RIGHTS OF THE DATA SUBJECT

It is important for the Data Controller that its data processing complies with the requirements of fairness, lawfulness, and transparency. To ensure that the data subject is aware of their rights and the conditions for exercising them, we provide the following information.

IV.1. Right of access

The data subject is entitled to request access to their personal data held by the Data Controller, submitted through one of the contact methods of the Data Controller. In this context, the data subject will be provided with information about the following:

- whether the processing of personal data is ongoing;
- the purposes of the data processing;
- the categories of personal data concerning the data subject;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the planned duration of storage of the personal data;
- the rights of the data subject;
- remedies available to the data subject;
- information regarding the data sources.

Furthermore, the data subject may request from the Data Controller the provision of a copy of the personal data undergoing processing. In this case, the Data Controller shall provide the personal data in a structured, commonly used, and machine-readable format (PDF/XML), as well as in printed form on paper. The request for a copy is free of charge.

IV.2. Right to rectification

The data subject is entitled to request the correction of inaccurate personal data concerning them and the completion of incomplete data processed by the Data Controller, based on a request submitted through the Data Controller's contact details. If the Data Controller does not have the necessary information to clarify or supplement inaccurate information, the Data Controller may request the submission of additional data and verification of the accuracy of the data. Until the correction or completion of the data can be carried out - in the absence of supplementary information - the Data Controller shall restrict the processing of the data subject's personal data and temporarily suspend operations performed on them, except for storage.

IV.3. Right to erasure

The data subject is entitled to request the deletion of personal data concerning them processed by the Data Controller, based on a request submitted through the Data Controller's contact details, if any of the following conditions apply:

- the Data Controller no longer needs the data for its original purpose;
- the data subject has concerns about the legality of the Data Controller's processing of their data.

If, following the data subject's request, the Data Controller determines that there is an obligation to delete the personal data it processes, it will cease processing the data and destroy the previously processed personal data. Additionally, the obligation to delete personal data may arise from the withdrawal of consent, the exercise of the right to object, or legal obligations.

IV.4. Right to restriction of data procession

The data subject is entitled to request the restriction of processing of personal data concerning them processed by the Data Controller, based on a request submitted through the Data Controller's contact details, in the following cases:

- the data subject has concerns about the legality of the processing of personal data concerning them by the Data Controller and requests restriction of processing instead of deletion;
- although the Data Controller no longer needs the data, the data subject requests them for the presentation, enforcement, or defense of legal claims.

The Data Controller automatically restricts the processing of personal data if the data subject disputes the accuracy of the personal data or exercises their right to object. In this case, the restriction applies for the period necessary to verify the accuracy of the personal data or - in the case of objection - to determine whether the conditions for continuing the processing are met.

During the restriction period, data processing operations cannot be carried out on the designated personal data; only data storage is permitted. Personal data can only be processed during the restriction of processing in the following cases:

- based on the consent of the data subject;
- for the presentation, enforcement, or defense of legal claims;
- for the protection of the rights of other natural or legal persons;
- for important public interest.

The Data Controller informs the data subject in advance about the lifting of the restriction.

IV.5. Right to object

The data subject may at any time object to the processing of their personal data based on the legitimate interests of the Data Controller, submitted through the contact details of the Data Controller. In this case, the Data Controller examines whether there are compelling legitimate grounds or interests (e.g., presentation, enforcement, or defense of legal claims) that override the interests, rights, and freedoms of the data subject. If such reasons or interests are identifiable, the Data Controller continues the processing of personal data. Otherwise, the personal data cannot be used further.

IV.6. Right to data portability

The data subject is entitled to request through the contact details of the Data Controller, the provision of personal data concerning them held by the Data Controller for further use determined by the data subject. Additionally, they may also request that the Data Controller transmit their personal data to another data controller designated by the data subject.

This right is limited solely to the personal data provided by the data subject based on Article 6(1)(b) of the GDPR. There is no possibility for the portability of other data. The Data Controller provides the personal data in a structured, widely used, machine-readable format (PDF/XML), or in its printed version on paper.

The exercise of this right does not automatically result in the deletion of personal data from the Data Controller's systems. Additionally, after the transfer of data, the data subject is entitled to re-establish contact or communication with the Data Controller.

IV.7. The procedure regarding the exercise of the data subject's rights

The Data Controller informs the data subject without undue delay, but no later than one month after receiving the request, about the measures taken regarding the exercise of their rights. If necessary, considering the complexity of the request and the number of requests, this deadline may be extended by an additional two months. The Data Controller informs the data subject about the extension of the deadline, stating the reasons for the delay, within one month of receiving the request.

If the Data Controller does not take action on the data subject's request, they inform the data subject of the reasons for not taking action promptly and, at the latest, within one month of receiving the request. They also inform the data subject that they have the right to lodge a complaint with a supervisory authority and to seek judicial remedy.

The Data Controller provides information regarding the action taken or the failure to take action in the form specified by the data subject. If the data subject submitted the request electronically, the information is provided electronically unless the data subject requests otherwise.

The Data Controller provides the requested information and guidance free of charge.

The Data Controller informs all recipients about any corrections, erasures, or restrictions on data processing that it has carried out, except when this proves impossible or involves disproportionate effort. Upon the request of the data subject, the Data Controller informs them about these recipients.

To fulfill the request, the Data Controller is obligated to ensure that it is indeed the entitled person who wishes to exercise their rights. In some cases, it may be necessary for the data subject to appear in person at the Data Controller's premises for identification purposes.

V. COMPLAINTS

V.1. LEAD SUPERVISORY AUTHORITY WITH RESPECT TO THE DATA CONTROLLER

If the data subject believes that the Data Controller has not processed their data in accordance with the relevant legal provisions, or has not acted correctly when the data subject exercised any of their rights related to data processing, the data subject is entitled to lodge a complaint with the following data protection supervisory authority. The designated authority is the lead supervisory authority in accordance with Article 56(1) of the GDPR, considering the location of the Data Controller's headquarters:

Name of authority	Dutch Personal Data Authority (Autoriteit Persoonsgegevens)
Headquarters	Hoge Nieuwstraat 8, 2514 EL, The Hague, The Netherlands
Mailing address	2509 AJ The Hague, The Netherlands, PO Box 93374
Phone	+31 (0) 88-1805-250
Website	https://www.autoriteitpersoonsgegevens.nl

V.2. LEAD SUPERVISORY AUTHORITY WITH RESPECT TO THE DATA PROCESSORS

If the data subject believes that any of the data processors have not processed their data in accordance with the relevant legal provisions, or has not acted correctly when the data subject exercised any of their rights related to data processing, the data subject is entitled to lodge a complaint with the following data protection supervisory authority. The designated authority is the lead supervisory authority as referred to in Article 56(1) of the GDPR, considering the location of the headquarters of data processors:

Regarding the data processors based in Hungary:

Name of authority	Hungarian National Authority for Data Protection and Freedom of Information
Headquarters	HU-1055 Budapest, Falk Miksa utca 9-11.
Mailing address	HU-1374 Budapest, PO Box 603.
Phone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
E-mail	ugyfelszolgalat@naih.hu
Website	http://www.naih.hu
Online filing	https://online.naih.hu/EMS/Home

Appendix 1

Name and details of the data processors

UNAS Online Kft.	hosting service	HU-9400 Sopron, Kőszegi út 14. unas@unas.hu
Gábor Levente Papp sole trader	website operation and maintenance	HU-6000 Kecskemét, Szolnoki út 8. 1.em 9. suni@swgy.hu
Éva Szeberényi sole trader	website operation and maintenance	HU-6000 Kecskemét, Szolnoki út 8. 1.em 9. evi@swgy.hu
Annamária Szabó sole trader	accounting	HU-1102 Budapest, Hölgy utca 29-31 1 em. 20