

PRIVACY POLICY on the processing of personal data carried
out from 25 May 2018

Music Engine Hungária Kft. (hereinafter referred to as the "Data Controller"), as the Data Controller, respects and is committed to protecting the privacy of all persons to whom personal data is disclosed in any form. Pursuant to Article 13 of the General Data Protection Regulation of the European Parliament and of the Council (Regulation (EC) No 679/2016, hereinafter referred to as "GDPR"), the Controller provides the following information:

Data of the Data Controller:

Company name: **Music Engine Hungária Kft.**

Address: 1124 Budapest, Levendula utca 13. 2/12

Website: www.music-engine.hu

Phone: +36-30-728-4539

E-mail: info@music-engine.hu

Representative: Ferenc Bódi, Managing Director

VAT :24690296-2-43

Company registry number:01-09-177505

Data Protection Officer: the controller is not obliged to appoint a Data Protection Officer under Article 37 of the GDPR

Data protection requests: if you have a request or question about data processing, you can send it to us at the postal or e-mail address indicated above. We will respond to you without delay, but within 30 days at the latest, to the postal or e-mail address you have provided.

Data processing: the Data Controller does not use a data processor.

Foreign data transfers: at most within the Music Engine group.

"Personal data" within the meaning of the GDPR:

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, 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.

The concept of "recipient" :

the natural or legal person, public authority, agency or any other body with whom or to which the personal data are disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities should comply with the applicable data protection rules in accordance with the purposes of the processing.

Automated decision-making or profiling:

Does the Data Controller use such a tool?	Information on the logic used	What are the implications and consequences for the person concerned
No.	Not relevant	Not relevant

DATA SECURITY MEASURES

The Controller stores the personal data provided by the data subject at the registered office or registered place of business of the Controller.

The Data Controller shall ensure that appropriate information security measures are in place to protect the personal data of the data subject against, inter alia, unauthorised access or unauthorised alteration. For example, access to personal data stored on servers is logged, so that it is always possible to check who has accessed what personal data, when and to what extent. The Data Controller shall take appropriate organisational measures to ensure that personal data cannot be accessed by an indefinite number of persons.

IT storage and logical security of data :

The Data Controller processes personal data primarily on an adequately equipped and protected IT system. In the operation of the IT system, it shall ensure an adequate level of basic information

security attributes of the data stored, processed and transmitted on it, such as the data processed:

- Integrity, the originality and integrity of the data is guaranteed;
- confidentiality (Confidentiality), only those who are entitled to it and only to the extent that they are authorised to do so;
- availability, the data is accessible and available to the right holders for the expected period of availability. The necessary IT infrastructure is available and operational.

Controller of the data processed:

- organizational, operational,
- physical security,
- information security

with a structured system of protection measures. The controller shall design and operate its system of protection measures and the levels of protection of each protection measure in proportion to the risks posed by the threats to the data to be protected. From a data protection point of view, the protection measures shall be primarily aimed at protecting against accidental or intentional deletion, unauthorised access, intentional and malicious disclosure, accidental disclosure, loss or destruction of data.

TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANISATION :

Name of third country or international organisation	EU Commission conformity decision, failing that, indication of guarantees	Binding corporate rule (if relevant)	Derogations for specific situations (if relevant)
Not relevant	Not relevant	Not relevant	Not relevant

Details of personal data and recipients: see Annex

The legal basis for the processing

The Controller processes personal data in accordance with the following legislation:

GDPR Regulation (EU) 2016/679 of the European Parliament and of the Council (27 April 2016) Act V of 2013 - Civil Code (Civil Code);

Act V of 2013 - on the Civil Code (Civil Code);

1. Purposes of the processing (pursuant to Article 5(1)(b) of the GDPR)

The controller may, in accordance with the law, process data for the following purposes:

- for the purpose of providing a legally sound background music service (notification to the authorities, e.g. MAHASZ, ARTISJUS, EJI)
- to fulfil customer orders,
- for the purpose of managing the contact details of partners,
- to maintain customer relations,
- for the purpose of processing employee data,
- to issue invoices in accordance with accounting legislation.

2. Legal basis for processing (based on Article 6 of the GDPR)

The processing of your personal data becomes lawful if one of the following legal grounds is met:

- provision of services: in accordance with Article 6(1)(c) of the GDPR,
- fulfil customer orders: pursuant to Article 6(1)(b) of the GDPR,
- processing of data of contact persons of partners: in accordance with Article 6(1)(b) of the GDPR,
- for the purpose of maintaining customer relations: in accordance with Article 6(1)(a) of the GDPR,

- processing of employee data: pursuant to Article 6(1)(c) of the GDPR,
- issuing invoices in accordance with accounting legislation: article 6(1)(c) GDPR.

3. Duration of processing (pursuant to Article 13(2)(a) of the GDPR)

- the storage period for invoices and the documents on which they are based: eight years,
- retention period for the documents on which the employment relationship is based: fifty years,
- the retention period of the data provided for the purposes of the contact: maximum one year after the contact has been established,
- retention of data relating to the performance of the contract: five years.

4. Data subject's rights (under Article 13(2)(b) and (c) of the GDPR)

In relation to your personal data, the data subject has the following rights set out in the law:

- right of access (Article 15 GDPR),
- the right to rectification and correction (Article 16 GDPR),
- the right to erasure (Article 17 GDPR),
- right to restriction (Article 18 GDPR),
- the controller's obligation to notify the rectification or erasure of personal data or the restriction of processing (Article 19 GDPR),
- the right to data portability (Article 20 GDPR),
- the right to object (Article 21 GDPR).

5. Information on remedies (under Chapter VIII of the GDPR)

- the right to lodge a complaint with the supervisory authority: the National Authority for Data Protection and Freedom of

Information (headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C., e-mail: ugyfelszolgalat@naih.hu),

- the right to an effective judicial remedy: against a legally binding decision of the supervisory authority and against the controller or processor.

APPENDIX:

PERSONAL DATA PROCESSING INFORMATION:

APPENDIX TO THE PERSONAL DATA PROCESSING NOTICE					
Purpose of data processing	Categories of data processed	Legal basis for data processing	Source of data	Recipient (data transmission, data processing, data subjects)	Purpose of disclosure
Customer contact	Name, email address, phone number	Voluntary contribution	Directly from the web-site	Music Engine Hungári a kft.	enquiry, contact

			concerned		
Order-fulfilment	Name, email address, phone number, delivery address	Performance of the contract	Lease and Service Contract	Music Engine Hungári a kft.	Providing and installing jukeboxes on site
Provision of services	Name, email address, telephone number, address, registered office, tax number, company registration number, mother's name, year of birth, place of residence	Performance of a contract, Public interest, Legal obligation	Lease and Service Contract	Music Engine Hungári a Kft, MAHASZ, ARTISJUS, EJI, SV-Consult GmbH	Fulfilling statutory reporting and notification obligations to the Authorities. External data transmission.
Employment, compliance with labour law	Employees' name, photo, email address, phone number, address, tax number, social security number, mother's name, year of birth, place of birth, previous jobs, education, bank account number	Legal obligation	Employment contract, ID and address card, social security card, tax certificate, diploma, photo CV, exit paper	Music Engine Hungári a Kft., NAV, Government Offices, Gombos Accounting Bt. etc.	Compliance with the Labour Code: (establishment and termination of employment), payment of employer's contributions. External data transmission
Compliance with financial, accounting legislation	Billing name, address, tax number, contact person, email address	Legal obligation	Lease and Service Contract	Music Engine Ltd., NAV, Government Offices, Gombos Bt.	Compliance with financial and accounting law, External data transfer.