

INFORMATION ON DATA PROCESSING

For the processing of personal data in connection with claiming surety insurance and with concluding contracts

EuroBond International Biztosításközvetítő Korlátolt Felelősségű Társaság

The purpose of the present Information on Data Processing is to enhance, in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council, i.e. the General Data Protection Regulation (hereinafter: Regulation or GDPR), the transparency of the purposes, legal bases and manners of the collection and use of data provided or available to **EuroBond International Biztosításközvetítő Korlátolt Felelősségű Társaság** (Registered seat/mailling address: H-1126 Budapest, Tartsay Vilmos utca 14.; Registry authority: Company Registry Court of Budapest-Capital Regional Court; Company registration number: 01-09-191522; Tax number: 24956053-2-43; Statistical number: 24956053-6622-113-01; hereinafter 'EBI'), as well as the accessibility, transfer and storage thereof by EBI, and the rights of natural person data subjects related to the processing of their personal data, in the course of using the product, service of surety insurance.

In the course of using the product, service of surety insurance, the processing of personal data available to EBI is a necessary and indispensable condition of using the service, and in case of denial or failure of data providing, the decision-making of EBI may be hindered, restricted or precluded.

1. Data Controller

Name: **EuroBond International Biztosításközvetítő Korlátolt Felelősségű Társaság**

Registered seat/mailling address: **H-1126 Budapest, Tartsay Vilmos utca 14.**

Company registration number: **01-09-191522**

Tax number: **24956053-2-43**

Website: www.eurobondint.com

Phone number: **+36 1 225 0038**

Email address: adatkezeles@eurobond.hu; info@eurobondint.com

Name of the representative: **Óvári Gábor, managing director**

2. General definitions:

data subject: any determined natural person identified or identifiable, directly or indirectly, based on personal data;

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

data controller: a 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

data processing: 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;

restriction of data processing: designation of the stored personal data for the purpose of restricting the future processing thereof;

data processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

client: the policyholder, the insured person, the beneficiary, the injured party, or other person who makes a contractual offer to the insurance company and who is entitled to receive benefits from the insurance company;

recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

personal data breach: 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;

Insurance secret: all data - other than classified information - in the possession of insurance companies, reinsurance companies and insurance intermediaries pertaining to the personal circumstances and financial situation or business affairs of their clients (including claimants), and the contracts of clients with insurance companies and reinsurance companies;

The following data qualify as insurance secret in particular:

- personal data of the clients of the insurance company;
- the insured asset and the value thereof;
- the insured sum;
- data related to health in case of life, accident or civil liability insurances;
- the paid insured sum and the date of payment;
- all relevant facts and circumstances related to the insurance contract, to the conclusion thereof, to the records thereof and to the service.

third party: 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;

profiling: 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;

Relevant laws:

Insurance Act: Act LXXXVIII of 2014 on Insurance Activity;

E-Commerce Act: Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Services Related to Information Society;

Advertising Act: Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activity;

Credit Institutions Act: Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises;

Accounting Act: Act C of 2000 on Accounting;

Private Security Act: Act CXXXIII of 2005 on the Activity of private security services and private investigators;

Distance Sales Act: Act XXV of 2005 on Service Contracts of the Financial Sector Concluded in the Frameworks of Distance Sales;

3. Data processing carried out by EBI and the purpose thereof

3.1. Data processing in relation to the use of products and services

The purpose of data processing carried out by EBI is the intermediation or provision of surety insurance, the identification of the data subjects/clients in relation to the use of the product or service determined in the present Information on Data Processing, rendering (or preparing) decisions on the claims for the requested product or service, including the right to the verification of data, communication, concluding contracts in case the conditions thereof occur, furthermore, mutual fulfilment and enforcement of rights and obligations related to the use of the product or service.

The processed data are the data provided by the data subjects in the course of concluding the contract, as well as other data which can be related to the data subject, generated in the course of using the service, and the consequences drawn therefrom.

PURPOSE OF DATA PROCESSING	PROCESSED DATA, SCOPE OF DATA	LEGAL BASIS OF DATA PROCESSING
Identification of the natural person using the product, service	name; place and date of birth; mother's name; address; citizenship; type and number of identification document; tax identification number or tax number; number of licence for self-employment; tax number of self-employed person; place of carrying out self-employment activity;	performance of a contract (Point b) of Article 6(1) in the GDPR)
Communication with the client	mailing address or address for service; phone or mobile phone number; email address	performance of a contract (Point b) of Article 6(1) in the GDPR)
Data of the required services	data of surety insurance	performance of a contract (Point b) of Article 6(1) in the GDPR)

3.2 Data processing activities determined as obligations of EBI

Certain laws prescribe mandatory data processing activities or transfers to EBI, where the legal basis of data processing is primarily the provision of law or the fulfilment of other legal obligation, e.g. data provision to certain bodies (tax authority, court, notary public, investigating authority etc.) in case of enquiries or data requests arriving therefrom.

We hereby inform you that the requests for data of authorities based on statutory authorization shall be fulfilled by the Data Controller. The Data Controller, in accordance with Subsections (2) and (3) of Section 15 in Act CXII of 2011 on Informational Self-Determination and the Freedom of Information

(Information Act), keeps a registry of data transfers (indicating: what personal data, to which authority, on what legal basis, when was transferred by the Data Controller), on the content of which the Data Controller shall provide information unless that is excluded by law.

3.3 Data processing for marketing and direct marketing purposes

From time to time, EBI appears on the market with new products and services, or may provide certain discounts in case of the use of its products or services in the frameworks of special offers.

Client contact:

EBI wishes to inform its clients of its products, special offers and available discounts on a regular basis. Thus, personal data collection and processing (e.g. by applying for receiving advertisements or newsletters on the website, by registration, by filling out a separate statement on marketing consent at claiming new products or services, by taking part in announced sweepstakes regulated in sweepstakes rules etc.) shall be carried out, based on the freely given consent of the Data Subject which may be withdrawn at any time, for further purposes, i.e. for providing information on new products or services, for more efficient and personalized serving of the Data Subject, for sending advertisement messages and for carrying out marketing activities.

The scope of data processed by the Data Controller for the purpose of direct marketing:

- name, address, place and time of birth, phone number, email address
- data pertaining to the personal circumstances and financial situation of the data subject (e.g. information pertaining to insurances, loans, savings at other financial institutions, to membership at health or pension funds, to information related to the existence of insurable vehicles, real properties and other assets).

Contacting non-client natural persons or, in case of companies, natural persons not representing clients, for the purpose of direct marketing:

For assembling a contact list or marketing list in order to obtain consent only for the acceptance of consignments sent for the purpose of direct marketing, only the data subject's name, address, email address or electronic communication identifier, place and date of birth, information pertaining to the data subject's scope of interest and marital status may be processed at most, if the contacted data subject consented thereto at the commencement of the inquiry carried out via electronic communications device (particularly by phone), at the beginning of the conversation.

Regarding the data subject, automated call system operated without any human intervention may only be used, for the purpose of direct marketing or providing information, with the data subject's prior consent.

EBI shall not send unrequested commercial messages, yet, it may contact non-client natural persons with the purpose of direct marketing based on its contact and marketing list. The addressee of such contact, made based on the authorisation provided by Section 3 of Act CXIX of 1995 on the Use of Name and Address Information Serving the Purposes of Research and Direct Marketing, may prohibit the use of his/her data for direct marketing purposes and may request the Data Controller to erase his/her data from its contact and/or marketing list.

Withdrawal of consent, erasure of data:

If a person, who has given prior consent thereto, does not wish to receive commercial, marketing messages from EBI in the future, he/she may make a statement of withdrawal in the following manners:

- by postal service, to the following mailing address: **H-1126 Budapest, Tartsay Vilmos utca 14**
- via email, to the following email address: adatkezeles@eurobondint.com

- by phone, dialling the following phone number: **+36 1 225 0038**
- in person, at the registered seat of EBI, during working hours.

The Data Subjects who withdraw their consent given to receiving marketing messages shall be added to a so-called 'prohibition list' pursuant to the law, meaning that such Data Subjects may not be sent marketing messages in the future.

3.4 Data processing activities for other purposes

3.4.1. Audio recording

In the course of complaint management, the Data Controller processes the personal data that becomes available to it in compliance with the regulations on complaint management prescribed in the Insurance Act, and keeps a register of the reported complaints and of the measures taken in order to settle, solve such complaints.

In case the complaint management is carried out by phone, the Data Controller makes audio recording of its communication with the client. Recording such communication is compulsory pursuant to the Insurance Act.

Beyond communication with the purpose of complaint management, the Data Controller may, in order to satisfy the needs and requirements for insurance more accurately, make audio recordings of the conversation carried out with the client in the course of sales activity until a memo of the conversation is prepared subsequently. The legal basis of such data processing is the performance of a contract (Point b) of Article 6(1) in the GDPR).

Beyond complaint management, audio recording is made of the telephone communication in cases where the conversation is relevant regarding the demonstration of statements of the parties made by phone, or, in contractual relationships, regarding the documentation of the cooperation of the parties, the contractual performance or the lawful process of the service provider.

In case of each recorded telephone conversation, at the commencement thereof, the client shall be informed of the audio recording and of the storage of and access to such record, as well as of the availability of the detailed information on data processing at the Data Controller's website and registered office which provides further information on the Data Subjects' rights related to data processing.

The audio recording shall be accessible by the persons to the work of whom it is required.

The audio record may be disclosed to the competent authority in case of complaint, and to the processing court in case of a possible legal dispute, moreover, it may only be used in other cases as prescribed by law.

If the data subject makes audio recording of a conversation carried out with EBI, the data subject becomes a data controller himself/herself, thus, the data protection regulations become applicable (e.g. purpose limitation of data processing, storage period etc.).

3.4.2 Data processing in connection with visiting the present Website, managing cookies

On the website www.eurobondint.com of EBI, it is not necessary to provide personal data to view the information accessible to anyone.

The Data Controller shall receive the following data on the visitors of the website automatically:

- visitor's EBI address,
- time of the visit,
- subsites and content viewed on the website.

Data processing in such regard may have different purposes: collecting information on the way the Data Subject uses the website, remembering the individual setting of the visitor, facilitating the use of the website for visitors etc. It may be related to sessions, advertisements, in order to display advertisements fitting the interest of the user, to facilitation of use, security of log-in etc.

Such data shall only be used by the Data Controller to conclude analysis regarding the website, to the development of the website, to increase user experience and to monitor the safe operation of the website.

Behavioural advertising may only be used on the website in case of prior informed, freely given consent of the Data Subject. The Data Subject shall be informed of actual application of cookies by placing a visible and perceptible warning sign on the website of using cookies, with reference to an information on cookie use which can be viewed with one click.

4. Scope of the processed data

EBI processes personal data primarily for the purpose of providing its products or services, which are basically the personal data provided and known by the Data Subject or obtained from third persons.

The processed data are the data provided by the Data Subject in the course of concluding the contract, as well as other data, which can be related to the data subject, generated in the course of using the service and the consequences drawn therefrom.

The information on the processed data are included in the Points above.

Depending on certain products or services, the related Framework Agreement, information, Data Processing Clause may include further details on data processing and on the processed data, where the pertinent provisions of the Business Rules shall be applicable regarding the accessibility and acknowledgement.

EBI carries out data processing activities lawfully, fairly and in a transparent manner.

The scope of the processed data is determined by the purpose of the data processing (e.g. identification, rendering decisions on insurance claims, communication etc.), personal data may only be processed limited to the purpose of the process, to the extent and for the period necessary to achieve such purpose, or for the term prescribed by law.

The data shall be accurate and, where necessary, kept up to date, for which purpose periodic data reconciliation is required.

If the data processing is carried out on behalf of the Data Controller, EBI shall only use processors who or which provide sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the GDPR and ensure the protection of the rights of the data subject.

EBI regulates the data processing activity carried out by the data processor in the contract concluded therewith.

5. The purpose, legal basis and other conditions of Data Processing

The processing of personal data by EBI shall only be lawful if at least one of the following applies:

- a) the Data Subject has given consent to the processing of his/her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which EBI is subject;
- d) processing is necessary for the purposes of the legitimate interests pursued by EBI or by a third party, except where such interests are overridden by the interests or fundamental rights and

freedoms of the Data Subject which require protection of personal data, in particular where the data subject is a child.

In case of certain data processing activities, the particular purpose and legal bases are set forth above.

6. Term of data processing (Storage period)

In principle, EBI shall erase all data pertaining to the Data Subject where the purpose of data processing has terminated, where the consent of the Data Subject regarding data processing is not available, or where the data processing lacks legal basis.

The different purposes and the different legal regulations result in different storage times. Pursuant to Section (1) of Article 6:22 in Act V of 2013 on the Civil Code (**‘Civil Code’**), the general limitation period applies to the storage of the data processed in paper form or electronically, i.e. five years calculated from the termination of the base contract.

Certain laws may prescribe further different, whether longer or shorter, storage periods. E.g. the storage periods prescribed in the Accounting Act or in Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (**‘Money Laundering Act’**), or that, in case of data processing on the basis of the data subject’s consent, the storage lasts until the withdrawal of such consent. In such cases, EBI stores the data in compliance with the mandatory storage period prescribed in the special law.

7. Scope of persons entitled to access the data

The data are accessible to the employees of EBI, for the purpose necessary to fulfil their tasks and to the extent strictly necessary for their work, who contribute in achieving the purposes of data processing and in monitoring thereof, and who act in relation to representation. Within the EBI as data controller, the accessibility of personal data is regulated in the internal working procedures on access authorization, in relation to each position.

Moreover, the data are accessible to the data processors and persons carrying out outsourced activities engaged by EBI, particularly the intermediaries, furthermore, to whom the data are transferred, based on whether the data subject’s consent or on the provisions of law, to the extent determined by EBI and necessary to carry out their activities.

EBI engages, in particular, the data processors indicated in Point 9 of the present Information, and the service providers carrying out outsourced activities for EBI in the frameworks of the pertinent service agreements.

8. Data transfer to third parties

EBI shall disclose your personal data to the service provider insurance companies indicated in a separate information.

The data processed by EBI also qualify as insurance secret. The pertinent provisions of the Insurance Act apply to the transfer of insurance secrets.

EBI shall transfer the data qualifying as insurance secrets to third persons only in cases determined by the pertinent law, except for the Data Subject’s consent.

Such data transfer may be carried out in the course of data providing prescribed by law (supervisory authority, MNB [Central Bank of Hungary], authorities etc.) on the one hand, and at replying to requests of authorities or other bodies, or at exercising monitoring rights on the other hand.

Transfer of personal data to third countries or international organisations may be carried out only if it is performed by the data controller or the data processor who accepted the data, in compliance with the conditions of data transfer prescribed in the GDPR.

9. Activities of data processors and outsourced activities

In the course of providing certain services or carrying out certain activities (e.g. IT services, operational tasks), EBI engages third parties, where the contractual partner of EBI carries out data processing activities pursuant to the instructions of EBI, thus, qualifies as data processor engaged by EBI. In the course of his/her/its activity, the data processor may access your personal data and is entitled to become aware thereof. In such cases, EBI shall take the appropriate organisational and technological measures for the protection of your personal data and shall require the taking of such measures also by its data processors for the protection of personal data.

The legal basis of the activities of data processors: compliance with a legal obligation (Point c) of Article 6(1) in the GDPR).

Your personal data is transferred particularly to the following recipients:

- a) persons providing IT system supporting services;
- b) service providers carrying out data storing, archiving, file storing, and destruction activities;
- c) legal representatives, attorneys;
- d) service providers carrying out postal, delivery and file management activities;
- e) service providers producing client receipts and information or providing printing services;
- f) companies carrying out bank card personalization and production;
- g) companies conducting payment transactions;
- h) companies carrying out claim management, and debt collectors.

In the course of the providing and the use of products and services, EBI shall transfer the data provided and available to it to third countries or to international organizations only in the cases determined by law.

The name and contact details of the data processors and the persons carrying out outsourced activities, and the services provided by them are indicated in Annex 1 of the present Information.

10. Rights of the data subjects in relation to data processing and the available remedies

The data subjects shall have the following rights in relation to data processing:

- a) to request information on the processing of his/her personal data;
- b) to request the rectification of his/her personal data;
- c) to request the erasure of his/her personal data or the restriction of data processing;
- d) to exercise his/her right to data portability;
- e) to object to the processing of his/her personal data;
- f) to turn to EBI or to the data protection supervisory authority in case his/her rights are infringed, or to seek remedy in court.

10.1. Transparent information, communication and promoting the exercise of the data subject's rights

The data controller shall provide all information related to the data processing in a concise, transparent, intelligible and accessible form to the data subject, using clear and plain language, particularly in case of information for children. The information shall be provided in writing or in other form, including electronic way. Oral information may be provided at the data subject's request, in case his/her identity has been verified in any other manner.

The data controller shall promote the exercise of the data subject's rights.

The data controller shall provide information on the measures taken in response to the data subject's request seeking the exercise of his/her rights, without undue delay but within one month of receiving such request at the latest. Such deadline may be extended by further two months under the conditions prescribed in the GDPR, of which the data subject shall be informed.

If the data controller fails to take any measures in response to the data subject's request, it shall inform the data subject, without undue delay but within one month of receiving the request at the latest, of the reasons of such failure and of that the data subject is entitled to lodge a complaint with the competent supervisory authority and is entitled to seek remedy in court.

The data controller shall provide the information on the data subject's rights free of charge, however, it may charge fee in the cases determined in the GDPR.

Detailed regulations are prescribed in Article 12 of the GDPR.

10.2. Right to prior information – where personal data are collected from the data subject

The data subject has the right to receive information on data processing prior to the commencement thereof. In that regard, the data subject shall be informed of:

- a) the identity and contact details of the data controller and its representative,
- b) the contact details of the data protection officer (where applicable),
- c) the purposes of the data processing for which the personal data are intended as well as the legal basis for the processing,
- d) where the data processing is based on pursuing legitimate interests, the legitimate interests pursued by the controller or by a third party,
- e) the recipients of the personal data to whom the personal data are disclosed, or categories of recipients, if any,
- f) where applicable, the fact that the controller intends to transfer the personal data to a third country or international organisation.

The data controller shall provide the data subject with the following further information necessary to ensure fair and transparent processing:

- a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- b) the existence of the right to request, from the data controller, access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- c) where the data processing is based on the data subject's consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- d) the right to lodge a complaint with the supervisory authority;
- e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
- f) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where the data controller intends to process the personal data further for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information.

Detailed regulations on the right to prior information are prescribed in Article 13 of the GDPR.

10.3. Information to be provided by the data controller where personal data have not been obtained from the data subject

If the data controller has not obtained the personal data from the data subject, the data controller shall inform the data subject of the facts and information listed in Subpoint 10.2 above, moreover, of the categories of personal data, of the sources of personal data, and (if applicable) of whether the data's source is publicly accessible; such information shall be provided within one month of obtaining the personal data, or, if the data are used for communication with the data subject, at the time of the first communication, or, if the disclosure of the personal data to another recipient is envisaged, at the first disclosure.

The above shall not be applicable if

- a) the data subject already has the information;
- b) the provision of such information proves impossible or would involve a disproportionate effort for the persons concerned; or
- c) would involve disproportionate costs; or
- d) obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests.

For further regulations the above Subpoint 10.2 (Right to prior information – where personal data are collected from the data subject) shall be applicable.

Detailed regulations on such information are prescribed in Article 14 of the GDPR.

10.4. Right of access by the data subject

The data subject shall have the right to obtain, from the controller, confirmation as to whether or not personal data concerning him/her are being processed. Where that is the case, he/she shall have access to the following information:

- a) the purposes of the processing,
- b) the categories of personal data concerned,
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly whether the data will be transferred to third countries,
- d) the period of data processing, or, if not possible, the criteria used to determine such period,
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

Detailed regulations on the right of access by the data subject are prescribed in Article 15 of the GDPR.

10.5. Right to rectification

At the data subject's request, the data controller shall, without undue delay, rectify the inaccurate personal data concerning the data subject, or, taking into account the purposes of the processing, the data subject shall have the right to request the completion of incomplete personal data, including by means of providing a supplementary statement.

Such regulations are prescribed in Article 16 of the GDPR.

10.6. Right to erasure ('right to be forgotten') and the right to restriction of data processing

The data subject shall have the right to request the erasure of personal data concerning him/her from the data controller, and the data controller shall erase, without undue delay, personal data concerning the data subject at his/her request, where one of the following applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to the data processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to offers of information society services offered directly for children.

The right to erasure shall not be applicable to the extent that processing is necessary

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of such processing; or
- e) for the establishment, exercise or defence of legal claims.

If the data controller has made the personal data public and shall erase such data for any reason, it shall take reasonable steps, including technical measures, taking into account the costs of available technology and means, to inform the data controllers which are processing such personal data that the data subject requested the erasure of any links to, or copies or replications of those personal data.

Detailed regulations on the right of erasure are prescribed in Article 17 of the GDPR.

10.7. Right to restriction of data processing

The data subject shall have the right to the restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) EBI no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or

- d) the data subject has objected to processing; in such case, the restriction shall be applicable for the period lasting until the verification of whether the legitimate grounds of the data controller override those of the data subject.

The data subject shall be priorly informed if the restriction is lifted.
The pertinent regulations are prescribed in Article 18 of the GDPR.

10.8. Notification obligation regarding rectification or erasure of personal data or restriction of processing

EBI shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. EBI shall inform the data subject about those recipients if the data subject requests it.

The pertinent regulations are prescribed in Article 19 of the GDPR.

10.9. Right to data portability

The data subject shall have the right to receive the personal data concerning him/her, which he/she has provided to EBI, in a structured, commonly used and machine-readable format and have the right to transmit those data, or have those transmitted directly by EBI, to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the data processing is based on consent or contract; and
- b) the processing is carried out by automated means.

The exercise of the right to data portability shall be without prejudice to Article 17 of the GDPR (Right to erasure ['right to be forgotten']). The right to data portability shall not apply to data processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Such right shall not adversely affect the rights and freedoms of others.

Detailed regulations are prescribed in Article 20 of the GDPR.

10.10. Right to object

The data subject shall have the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her by EBI on the basis of legitimate interest and in relation to profiling. In such case, EBI shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

10.11. Withdrawal of consent

In case the processing of personal data is based on the Data Subject's consent, the Data Subject shall have the right to withdraw his/her consent given to EBI at any time. However, such withdrawal shall not entail automatic erasure of the concerned data; erasure shall only be carried out if the data processing does not have any other legal bases.

10.12. Communication of a personal data breach to the data subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the data controller shall communicate the personal data breach to the data subject without undue delay. The communication shall describe in clear and plain language the nature of the personal data breach and shall contain at least the following information:

- a) the name and contact details of the contact person providing the information;
- b) description of the likely consequences of the personal data breach;
- c) description of the measures taken or proposed to be taken by the data controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject shall not be required if any of the following conditions are met:

- a) the data controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- b) the data controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;
- c) it would involve disproportionate effort. In such cases, there shall be a public communication or similar measure applied instead, whereby the data subjects are informed in an equally effective manner.

Further rules are prescribed in Article 34 of the GDPR.

10.13. Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her. Thus, the Data Subject shall have such right regardless of his/her request.

Such right shall not be applicable if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

In the cases referred to in the above Points a) and c), the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his/her point of view and to contest the decision.

In the cases of applicability indicated above, the decisions shall not be based on special categories of personal data, unless express consent has been given, if suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.

Further rules are prescribed in Article 22 of the GDPR.

10.14. Restrictions

Union or Member State law to which the data controller or processor is subject may restrict, by way of a legislative measure, the scope of the obligations and rights provided for in Articles 12 to 22 and Article 34, as well as Article 5, when such restriction respects the essence of the fundamental rights and freedoms.

The conditions of such restriction are prescribed in Article 23 of the GDPR.

10.15. Remedies

We hereby propose that, before initiating administrative or judicial procedure, take the opportunity to lodge an objection or a complaint with EBI.

In relation to the exercise of your rights, you may proceed at EBI in the following ways:

- a) by postal service, sending the consignment to the registered seat or mailing address of EBI,
- b) via email, sending it to the email address for complaint management indicated at the website of EBI,
- c) by phone, dialling the phone number indicated at the website of EBI, where identification and audio recording shall be carried out, and
- d) in person at the registered seat of EBI, during working hours.

Hungarian National Authority for Data Protection and Freedom of Information

The data subject may lodge a complaint in relation to the processing of his/her personal data with the data protection supervisory authority (Hungarian National Authority for Data Protection and Freedom of Information, H-1125 Budapest, Szilágyi Erzsébet fasor 22/c, mailing address: 1530 Budapest, Pf.: 5. e-mail: ugyfelszolgalat@naih.hu).

Court

The data subject may initiate judicial proceedings against EBI or against the data processor, in relation to data processing activities falling into the data processor's scope of activities, in case the data subject considers that EBI or the data processor engaged by EBI or acting pursuant to EBI's instructions processes his/her personal data with the breach of law on personal data processing or of regulations prescribed in the legally binding acts of the European Union.

The suit may also be filed, according to the data subject's choice, with the court competent based on his/her place of residence or place of stay. The court shall hear such cases in priority proceedings. EBI shall demonstrate the compliance of data processing with the regulations of law.

11. Response to the requests of the data subject

EBI shall provide information on the measures taken in response to the data subject's requests pursuant to Point 7 and to his/her complaints pursuant to Point 7 without undue delay but within one month of receiving such request at the latest. Such deadline, depending on the complexity of the request, may be extended by further two months. The EBI shall inform the data subject of extending the deadline for response within one month of receiving the request.

If the data controller decides not to take any measures in response to the data subject's request, it shall inform the data subject, without undue delay but within one month of receiving such request at the latest, of the reasons of such decision and of that the data subject is entitled to lodge a complaint with the competent supervisory authority and is entitled to seek remedy in court.

EBI shall provide information on the data subject's rights free of charge. In case the data subject's request is manifestly unfounded or, particularly due to its repeated manner, exaggerated, EBI may deny taking measures in response to such request, taking into account the administrative costs entailed by providing the requested information or taking the requested measure.

12. Security of data processing

EBI shall proceed in order to achieve the safe operation of its IT system and maintain the protection of data pursuant to Information Act, to the GDPR, and to other pertinent Hungarian and European Union law.

In order to achieve the protection and safety of personal data, EBI ensures the security of data processing by taking internal regulatory (data protection and confidentiality, information security, access authorization etc.), organisational, technical and educational measures.

Such measures are, for example: technologies creating IT security infrastructure (e.g. regulation of access control and authorisation management systems which restrict the access authorizations to the extent necessary in the case of each employee), certain separations (e.g. of insurance records), protection against data leakage, computer IDs, screen protection, logging etc.

EBI shall ensure the protection of the security of data processing by taking technical, organisational and management measures which provide the adequate level of protection, taking into account the risks emerging in relation to data processing. In the course of data processing, EBI shall keep confidentiality: by protecting the information so that only to authorized persons shall access it; it shall keep integrity: by protecting the accuracy and fullness of information and of processing measures; it shall keep availability: by ensuring the entitled user's access to the desired information when he/she needs it and the availability of the related devices.

To achieve protection against certain risks (e.g. phishing emails, viruses, spyware), filter software are applied. That may sometimes result in blocking e.g. private letters arriving from outside.

For further protection of the data subjects' data, EBI engages a data protection officer who shall report to the highest management level of the controller and shall not take instructions from anyone in relation to the fulfilment of his/her tasks.

If the data processing is carried out on behalf of the Data Controller, EBI shall only use processors who or which provide sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the GDPR and ensure the protection of the rights of the data subject.

13. Other provisions

EBI shall provide information on the data processing activities not included in the present Information at the obtaining of the data. We hereby inform our clients that the court, the prosecutor's office, the investigating authority, the misdemeanour authority, the administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information, the MNB or other bodies based on the authorization of law may request the provision of data or the handover of documents from the Data Controller. EBI shall provide personal data to the authorities only to the extent strictly necessary for achieving the purpose of the request, and only if the authority indicates the precise purpose and the scope of the requested data.

14. Amendment of the present Information

EBI may, within the frameworks provided by law, amend the present Information on Data Processing from time to time so that it shall be in accordance with the legal obligations of EBI and with the changes of the activities related to the processing of the data subject's data. Please check the effectiveness of the present Information on Data Processing regularly in order to be aware of the possible amendments.

In case of any amendment of the present Information, EBI shall notify its clients by displaying an information on www.eurobondint.com website at least 15 days prior to the effective date of the amendment.

Budapest, 25 May 2018

EuroBond International
Biztosításközvetítő Felelősségű
Társaság

Data of data processors and persons carrying out outsourced activities

Name and contact details of data processor or person carrying out outsourced activities	Provided services	The scope of transferred data	Term of data processing or outsourcing
<ul style="list-style-type: none"> • Name: Eurokontroll Kft. • company registration number: 01-09-167798 • registered seat: 1011 Budapest, Mária tér 5. mfszt. 1. • email address: office@eurokontroll.hu • website: www.eurokontroll.hu • Representative: Tóth Géza Péter 	accounting, HR and labour related services, payroll services	<ul style="list-style-type: none"> ▪ full scope of data determined in Point 5 above. 	Term of service agreement, until the erasure (withdrawal) of personal data, and the civil law limitation period thereafter, unless otherwise provided by law
		<ul style="list-style-type: none"> ▪ full scope of data determined in Point 5 above. 	Term of service agreement, until the erasure (withdrawal) of personal data, and the civil law limitation period thereafter, unless otherwise provided by law

EBI shall provide separate information on any further data processors or persons carrying out outsourced activities to the data subjects.