

# PRIVACY POLICY

## Social media data management Social media, advertisements

Applicable from 07.06.2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

### 1. Data controller

Name of data controller:		Terendo Hungary Kft.
Address of data controller:		31 Páskomliget street, 6 <sup>th</sup> floor, 24., 1156 Budapest
Contact details of data controller:	e-mail	info@terendo.com
	telephone	+36307588809
	website	www.terendo.com

### 2. Data processed

#### Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Data from the public profile Comments Event data managed by a social platform	Promotion of service, presentation of employees, targeted advertisements, searching for new employees, advertising for them. Managing interactions related to posts (sharing, likes, comments), answering possible questions – Facebook, Instagram, LinkedIn	Consent of the data subject - GDPR Article 6 (1) Paragraph a)	Until the consent is withdrawn / the entry is deleted by data subject, or at latest until the operation of social site. More detailed information can be found in the privacy policy of the social website. During the usage of social platforms, the data controller does not store personal data. It can have access to data during the management of the page, and indirectly manages the data through certain social media services (e.g.: advertisements) – it does not have direct access to them.

#### Related legislation

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#### Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

### Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	---

If yes, data subject has the right to request for manual, human intervention.

### Source of processed personal data:

Data subject
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### Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Google Ads 3rd Floor Gordon House, D04 E5W5 Barrow Street, Dublin, Ireland, Advertising platform Linkedin 2029 Stierlin Court Ste 200 Mountain View, California, 94043, United States, Social media, Zapier Inc. 548 Market St. #62411, San Francisco, CA 94104-5401 Automation system operator
Recipients	

### Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Google Ads,USA, Terms and Conditions of service providers and privacy policy Data Privacy Framework, <a href="https://policies.google.com/privacy/frameworks">https://policies.google.com/privacy/frameworks</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> , Parent company access, Facebook,USA, Terms and Conditions of service providers Privacy Policy Data Privacy Framework, <a href="https://hu-hu.facebook.com/privacy/explanation">https://hu-hu.facebook.com/privacy/explanation</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> , Parent company access, Linkedin,USA,General Terms and Conditions and Privacy policy , <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a> ,Data storage, Zapier Inc.,USA,Privacy Statement Data Privacy Statement, <a href="https://zapier.com/privacy">https://zapier.com/privacy</a> <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a>

### Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
Yes	Facebook Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, Social media

### Access to data and data security measures:

<b>Restriction of access</b>	Only data controller and competent employees have access to the managed data in order to perform their duties. This is ensured by authorization management.
<b>Data security measures</b>	Paper-based documents are stored locked. In case of computer storage, devices used have a firewall, virus protection and password protection. In addition, the used software and applications can be accessed by entering a password, if possible with two-factor authentication. The devices used have the basic security settings and functions. The stored paper-based and electronic data are also protected by physical measures. Unauthorized persons cannot enter the office. The company operates a camera system for site security.

### 3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins <i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it. <i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller.

*Right to erasure ("right to be forgotten")* - Data Subject is entitled to request for permanent deletion of his/her data, unless data processing is based on the fulfillment of a contract, fulfillment of a legal obligation or in the exercise of an official authority vested in the controller.

*Right to withdrawal of consent* - If data processing is based on consent, Data Subject may withdraw consent previously given at any time. Acceptance of withdrawal request may also mean deletion of data but if another legal basis supports data processing, data processing will only end in relation to the specific data processing purpose.

*Right to restriction of processing* – Data Subject shall have the right to request for suspension of personal data processing for the period of investigation if he/she does not consider the data controller entitled.

*Right to data portability* - Data Subject shall have the right to receive the personal data concerning him or her in a structured, digital form.

*Right to review of automated individual decision-making* - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.

#### 4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, 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 not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

#### 5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Headquarters</b>	9-11 Falk Miksa road, H-1055 Budapest
<b>Postal address</b>	Mailbox 9., H-1363 Budapest
<b>Email</b>	ugyfelszolgalat@naih.hu
<b>Telephone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>Website</b>	http://naih.hu

#### 6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A 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.

***By registering for social media platform, visiting the website and interacting, data subject consents to the management of his/her data.***