

# **SÚDY & CO., LTD.**

## **SUBJECT ACCESS REQUEST PROCESS AND FORM**

### **1. Introduction**

This procedural document is a supplement to the privacy policy of Súdý & Co. Ltd. (hereinafter referred to as ST), and it describes the process of requesting detailed information on stored personal data and steps of the procedure if we receive such a request at our company.

In some cases, ST needs to collect personal information to be able to carry out its everyday business effectively and comprehensively, to provide its customers with adequate services, and - under certain circumstances - to comply with legal regulations.

Since ST processes personal data of individuals (data subjects) according to the General Data Protection Regulation (GDPR) and the Hungarian Information Act, it needs to protect this kind of information, and in case of collecting, using, storing, or deleting data, it needs to comply with the regulations and principles of the GDPR and the Hungarian Information Law.

#### **1.1 General Data Protection Regulation (GDPR)**

The General Data Protection Regulation (GDPR) entitles individuals to inquire about what information is stored about them at companies and to exercise the rights listed in the GDPR, such as requesting the correction of inaccurate data. Superseding the Data Protection Directive 95/46/EC, the GDPR ensures that personal information is collected, processed and destroyed properly according to the regulations within the EEA and the EU, and applies to enterprises established in the EEA or —regardless of their location and the data subjects' citizenship—that are processing personal information of data subjects in the EEA or the EU.

ST is committed to complying with the GDPR privacy regulations, and is therefore committed to ensuring that personal information is:

- a) treated in a lawful, fair and transparent manner ("the principle of lawfulness, fairness and transparency").
- b) collected for well-defined, explicit and legitimate purposes, and processed only until they are required for the original purpose for collecting data. ("Purpose limitation principle").
- c) limited to certain purposes, and only the most needed and minimal data that are necessary to achieve the goals will be collected ("data minimization principle").
- d) accurate and up to date. ST shall take all reasonable steps to ensure that all personal data - considering the purpose of their processing – will be corrected or deleted immediately, if any data is inaccurate. ('Precision').
- e) stored in a manner that allows the identification of the data subject, but only for as long as these are strictly necessary for the processing purposes ("storage limitation principle").
- f) handled with appropriate security, technical or organizational measures, including protection against unauthorized or unlawful processing, accidental loss, deletion or damage of the data ("integrity and confidentiality principle").

The Regulation also specifies that the data controller is responsible for complying with the GDPR principles and to be able to prove it ("accountability principle").

ST practices appropriate and effective measures, checkups and procedures that protect personal data, and guarantee that the data have been collected and processed only in accordance with the applicable data protection laws and regulations.

## **2. WHAT IS PERSONAL INFORMATION?**

According to GDPR and the Hungarian Information Act, "personal data" means: "Information relating to any identified or identifiable natural person; an identifiable natural person is a person who can be identified - directly or indirectly – based on a particular identifier, such as name, number, positioning data, online identifier, or can be identified by one or more factors relating to physical, physiological, genetic, intellectual, economic, cultural or social identity of a natural person. "

Further information on personal data and data subjects' rights according to GDPR and the Hungarian Information Act can be found on the [website](#) of the National Authority for Data Protection and Freedom of Information (NAIH) in Hungarian.

## **3. THE RIGHT TO ACCESS**

According to Article 15 of the GDPR, an individual has the right to know whether the data controller stores any personal data about him/her. Since at ST, we are committed to guaranteeing the rights of individuals, we have controlled processes to ensure access to personal data stored at our company. If necessary, we can provide the following information:

- purpose (s) of processing
- the categories of personal data involved
- the categories of recipient (s) to whom the personal data have been disclosed in the past
- if the data are forwarded to a third country or international organization (s) (by ensuring appropriate security procedures)
- the planned period for which personal data will be stored (or the criteria used to determine this period)
- if personal data were not collected directly from the individual, we can provide any available information about the source.

### **3.1 How to make a Subject Access Request?**

As a data subject, if you submit an inquiry about personal data to our company, we will inform you about what personal information we store about you at ST. We are obliged to provide you this information (unless you are one of the exceptions) according to the GDPR. The personal information we can provide is listed on the last two pages of this document.

You can submit this request in writing, based on the information provided in Section 7, or you can send it electronically. If we receive the request electronically, we will provide you with the requested information in a commonly used electronic form. (unless specifically requested otherwise).

### **3.2 What do we do when we receive an access request?**

#### **Verifying your identity**

Our Data Protection Officer (DPO) will receive your request for personal information and records as soon as possible. Our DPO shall take all reasonable steps to verify the identity of the person requesting access, especially if it is submitted in electronic form.

The information requested on the request form is only used to verify your identity. If this procedure fails for some reason, we may ask you for further information or evidence to prove your identity before we start processing your request. We do all these steps to protect your personal information and rights.

If a third party, a relative or a representative requests information on your behalf, we will verify whether he/she is authorized to do so, and we may contact you to get your authorization before taking any action to release the data.

## Gathering information

If you have provided enough information on the request form for identification, we will collect all documents that contain your personal data and ensure that all necessary information is presented to you in an acceptable format. If we have not received enough data to find the relevant materials, we may contact you for further information. We do our best to promptly process your request within the timeframe specified below.

## Providing information

After we collect all personal data concerning you, we will send you these in writing (or a commonly used electronic form). The information will be provided in a concise, transparent, easy-to-understand and accessible format.

## **4. FEES AND TIMEFRAMES**

Our goal is to process all access requests within 30 days. We provide you the required information free of charge. If you submit your application electronically, we will send you the information on a commonly used electronic form unless you request it otherwise.

Although we provide you the required information free of charge, you will be charged a separate fee to cover the administrative costs, if you want to receive additional copies of the documents.

ST will always do its best to provide the requested information as soon as possible (within 30 days from the date of receiving the request). However, if the request or the provision of the information are particularly difficult or there are valid reasons for delay, this period may be extended by further two months. In this case, we will message you within 30 days and inform you about the delay and its reasons.

## **5. OTHER RIGHTS**

According to the GDPR, you have the right to request the correction of your inaccurate personal data that we store about you. If we receive a notice of inaccurate data and agree that it is indeed inaccurate, we will modify it in the manner you specify, then add some comments about the change and record the reason in our system (or records).

We will correct the errors within 30 days from the date of receiving the request and inform you about the correction process in written form. In case a third party is also involved in the process, we will also send you its details.

If we are unable to complete the requested correction and / or replacement of incomplete data for any reasons, we will provide you with a written explanation of our obstacles and reasons, then inform you that you have the right to appeal to the specific supervisory authority.

Under certain circumstances, you may be entitled to request ST to erase your personal data or limit its processing range, and you also have the right to object to the processing. If you have such requests, please contact us using one of the contacts listed in Chapter 7.

## **6. OTHER SUPPLEMENTARY INFORMATION AND NOTICE ON THE REFUSAL OF A REQUEST**

In some cases, GDPR grants exemptions from the disclosure of your personal data. If one or more of these exemptions apply to the submitted request, or if ST is unable to act on it, we will notify you as soon as possible (but no more than one month after receiving your request).

If possible, we will inform you why we could not process your request, then you can file a complaint at the relevant supervisory authority, and you also have the right to apply for judicial remedies. For details about how to contact the supervisory authority, see section 7 of this document.

## **7. CONTACTS FOR SUBMITTING REQUESTS OR CLAIMS**

Please send your request for access to your personal data to our Data Protection Officer at [sebok@sudy.co.hu](mailto:sebok@sudy.co.hu). You can submit your request in writing using the form on the last page, by sending it to the following mailing address:

**Súdy & Co. Ltd., Data Protection Officer**  
H-1037 Budapest, Montevideo utca 4.

### **7.1 Supervisory Authority**

If you are still dissatisfied with the steps we have taken, you have the right to file a complaint at the corresponding supervisory authority. Contact information of the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

Hungarian National Authority for Data Protection and Freedom of Information  
Szilágyi Erzsébet fasor 22 / C 1125 Budapest  
Tel. +36 1 3911 400  
e-mail: [peterfalvi.attila@naih.hu](mailto:peterfalvi.attila@naih.hu)  
Homepage: <http://www.naih.hu/>

# SUBJECT ACCESS REQUEST FORM

## Important Information

ST collects, stores, processes and handles certain personal data of its employees, data processing partners, business partners, and applicants for Japanese job opportunities (“data subjects”).

According to the EU 2016/679 General Data Protection Regulation (GDPR), as a data subject you have the right to learn how we handle your personal data. We can provide you with the following information:

- confirmation whether we handle and store your personal information or not
- if so, who has access rights to your data
- how we use your personal information and for what reason(s)
- details regarding sharing your personal data with third parties
- the time period we store your data
- details of your rights granted in GDPR, including, but not limited to, the right of withdrawing your consent to the processing of your personal data or the right to object to the processing of your data.

Under normal circumstances, the above information is provided free of charge. However, we reserve the right to charge a reasonable fee for unfounded, excessive or repetitive requests. These fees will only cover our administrative costs that may arise during the execution of such requests.

Please fill in the form below and send it to us by email and / or by post to the following address:

**Súdy & Co. Ltd., Data Protection Officer**

1037 Budapest, Montevideo utca 4.

E-mail: [sebok@sudy.co.hu](mailto:sebok@sudy.co.hu)

You are not required to use this form, and you can use another type of form with the same contact data as well.

Once we have received your request, we may contact you if we require additional information about you for identity verification purposes. We do all these steps to ensure the protection of your personal data.

We do everything to respond to and complete any requests we receive within a month. However, if we need more information from you, or if your request is especially difficult, processing your request may take more time. If there is a delay, we will inform you.

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According to the Hungarian Law of Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred as: Infotv.) 15§ (1) paragraph and the European Union's GDPR, I am requesting information about my personal data handled and stored at your company.

Name: .....  
Additional data necessary for the identification of the data-subject: .....  
.....

Based on 15. § (1) paragraph of Hungarian Infotv. and the GDPR, please provide information about my personal data handled by Sűdy & Co., Ltd., including their source / purpose / legal basis / duration of data handling / name of the data processor, its address and its data processing activities / in case of transferring my personal data: the addressee and the legal basis of the transfer / the circumstances, and effects of a data protection incident and measures taken to counteract these potential incidents (*Please, underline the needed information!*).

I have the following specific question: .....  
.....  
.....  
.....

Please send the information to the address below: .....  
.....

## Declaration

Being aware of my criminal responsibility, I declare that the information I have provided above is true. With my signature I guarantee that the person named in the application is me and I will fully indemnify Sűdy & Co., Ltd. for any loss and expenses if it does not correspond to reality.

Name:

Signature:

Date: