# **Privacy Policy**

made for the partners of the business operator, SUBAN Instruments Hungary Co. (company registration number: 09-10-000287), tax number: 11622453-2-09) registered address: H-4032 Debrecen, Füredi út 98., with respect to using the website <a href="http://suban.hu">http://suban.hu</a>.

During its operation as a data controller and data processor, our Company considers it as particularly important to ensure the protection and safety of the data of its partners, contacted natural persons, and other natural persons whose data are received (hereinafter collectively referred to as data subjects), as well to respect their rights as data subjects, and the possibilities of enforcing thereof. In light of the foregoing, for the purpose of, and in order to comply with the effective Hungarian and European legal provisions, it shall provide the following short information to all data subjects who wish to contact us based on the information on our website, and for those visiting the above website, based on our activity on the webpage.

The contracts to be concluded during the use of the website are <u>considered as distance contracts</u>; therefore, the term used in this Policy - which is part of the entire Data Protection- Privacy Policy of our Company - for contracts concluded between distant parties based on online information shall be "Web Store", with respect to the fact that its goal - although direct sales are not performed via these modules - is to increase the sales turnover of our Company, and to sell you our products in accordance with your needs.

#### Who is the Data Controller?

With respect to this Policy, the Data Controller is SUBAN Instruments Hungary Co., registered under company registration number 09-10-000287, by the Tribunal Court of Debrecen as Court of Registration. The data controller:

Tax number: 11622453 -2-09 Phone: +36 52 507-000, Fax: +36 52 520-581

E-mail address: info@suban.hu\_sales@suban.hu

Registered address: H-4032 Debrecen, Füredi út 98. Shop

address: 4032 Debrecen, Füredi út 98.

The person responsible for data protection at our Company is Sándor Andorkó, whose postal address is the same as the registered address of the Company, and whose phone number is: +36 52 507-023.

#### Who are the data subjects?

Data Subject is any specified natural person identified or identifiable directly or indirectly by personal data, whose data are controlled by the Data Controller.

You may be a data subject in connection with the Web Store and website at the above address if you

- visit the website or Web Store,
- perform any activity within the Web Store,
- register at the Web Store,
- request a quotation via the Web Store, contact us via phone based on information found at the website

### How long are your data processed?

The answer to this question depends on how you came into contact with us. During the data processing activities of our Company, the following of your data are processed:

### I. One-time request for information

During the request for information process, the data processing is based on your consent. The data are provided by the data subjects at the time our Company is contacted. During the processing of your request our Company may only request additional data if it is necessary to identify you more precisely in order to provide the requested information.

In the case of a one-time request for information you become a Data Subject if - in addition to providing your personal data - you also request information from our Company.

During one-time request for information, the Data Controller processes the following personal information:

	mation.
description of data	purpose of data processing
name	your identification in order to provide you with the right information, and to communicate with you
company name	name of the company on behalf of which you register as a contact person
e-mail address	communication with you during providing information
the point of the question you have asked	response
other data included in your e-mail (e.g. phone	eto ensure that we can communicate with you even
number, specific parameters)	just for a short period of time (via phone), and to
	ensure the greatest accuracy of the information provided

In case the question you have asked affects business secrets, and the above data fail to reveal whether you are entitled to know such information, then our Company may request you to provide further identifiers (number and content of the letter of appointment, authorization). The provision of additional data is also based on your consent, and in the case of failure to submit such consent, during the information request our Company shall issue a declaration containing that the requested information may not be provided, and it shall also record the legal basis of refusing the provision of data.

Our Company as data controller will only process these data until the purpose is completed, that is, the data will be erased as soon as your request is fully answered to your satisfaction; in case such erasure is not executed, the data will be erased at the time our Company issues its declaration on the denial of data disclosure, indicating the law properly substantiating the declaration. There is no data transfer during one-time request for information.

With respect to this website, one-time request for information can be made via e-mail. Our Company only provides data via phone with respect to a request for quotation, or a contract is already in progress.

During one-time request for information, your data may be accessed by the sales staff of our Company, the CEO and the CEO's assistant.

### II. Request for quotations

During the request for quotation, the data processing is based on your consent. The data are provided by you at the time you submit a request for quotation to our Company with respect to buying one of the products found in our Web Store. The process of request for a quotation is as follows: after the selected products are placed in the Shopping Cart, click on the menu "Request for Quotation", then - after checking the contents of the Shopping Cart - click on the button ""Submit Request for Quotation". There is a possibility to submit a custom request for a quotation as well, by sending an e-mail to: sales@suban.hu.

In view of the fact that your contact name, address, phone number and e-mail address was recorded during registration, you become a data subject during registration.

During the request for a quotation, the data controller processes the following data:

description of data	purpose of data processing
description of data	purpose of data processing
name	your identification in order to provide you with the
	appropriate offer, and to communicate with you
phone number	communication with you during the quoting
	process, clarification of the request for a quotation if
	necessary
e-mail address	communication with you during the quoting
	process, the content of the question you have
	asked, providing the answer
the request for a quotation you have specified	quoting
the performance due date you have specified	in case you indicate a performance due date via e-
	mail, such data will be processed as your personal
	data; the purpose of such data processing is
	quoting
special requests you have specified	in case you indicate a performance due date via e-
	mail, such data will be processed as your personal
	data; the purpose of such data processing is
	quoting

Our Company, as the data controller, will only process these data until the expiry of the validity period of the quotation, that is, such data will be erased on the business day following the deadline included in the quotation we have placed.

There is no data transfer during the process of a request for a quotation.

During request for a quotation, your data may be accessed by the sales staff and the CEO of our Company.

## III. Registration at the Web Store

During registration, the data are provided by the data subject when entering his/her data during registration at the above Web Store operated by our Company.

During registration you become a data subject when you register as a contact person at the online platform of the Web Store, or when you are registered as contact person by another staff member. Registration is a special contract aimed at use, which is not recorded on paper, and is only concluded electronically by the parties with the purpose of ensuring that you, as the contact person of the legal business operator represented by you has the possibility of requesting a quotation from our Company with respect to the products that meet the needs of the business operator represented by you.

During registration, the data controller processes the following data:

description of data	purpose of data processing
name	your identification in order to communicate with you
phone number	communication with you
e-mail address	communication with you
your contact address	communication with you
password	ensuring safe entry for you
registration date	determining the conclusion of the contract

Legal basis of the data processing: the performance of the user agreement. The user agreement created during registration is contained in the General Terms and Conditions.

Duration of the data processing: until the registration is deleted. The cancellation of registration may be initiated by the data subject via an e-mail sent to any e-mail address indicated in this Policy. The registration will also be canceled if justified by the business processes of the data controller (profile change), or in case the Web Store ends. In all cases, the data subject will be sent prior notification on the cancellation of registration.

During registration, the data processor is the hosting service provider. **Data of the hosting service provider:** 

Name: Web Press Hungary Kft.

Registered address: 1085 Budapest, József körút 69. Customer service phone number: +36 30 9974950

E-mail address: info@wphkft.hu

The purpose of data processing is to ensure the operation of the Web Store; its method: the data subject records the registration directly in the database of the Web Store operated by the data processor at <a href="http://www.suban-instruments.com">http://www.suban-instruments.com</a>

Registration data are processed electronically, on the servers operated by the contracted partners of the data processor.

Your data provided during registration at the Web Store may be accessed by the sales staff of our Company, the CEO, and the system administrator of the data processor.

#### IV. Cancellation of registration

During cancellation of registration, the data are provided by the data subject when he/she initiates the cancellation of registration via e-mail, postal mail or at our customer service with respect to the above Web Store operated by our Company.

You become a data subject during cancellation of registration if you request the termination of your registration, or in case the Service Provider cancels your account due to profile change.

During the cancellation of registration initiated by you, the data controller processes the following data:

Burning the cancellation of registration initiated by you, the data controller processes the following data.		
description of data	purpose of data processing	
name	identifying your account	
phone number	communication with you	
e-mail address	communication with you	
date of request initiating the cancellation of registration	definition of the termination of the contract	

Legal basis of the data processing: termination of the user agreement.

Duration of the data processing: for 5 years after the registration is deleted, that is, until the end of the limitation period for civil claims with respect to the termination of the user agreement.

During the cancellation of registration, the data processor is the hosting service provider, whose data are available above in Section III.

The purpose of data processing is to enforce your rights; its method: the data processor deletes the registration directly from the database of the Web Store operated by the data processor at <a href="http://www.suban-instruments.com">http://www.suban-instruments.com</a> Registration data are processed electronically, on the servers operated by the contracted partners of the data processor.

Your data provided during the request for the cancellation of registration at the Web Store may be accessed by the sales staff of our Company, the CEO, and the system administrator of the data processor.

#### V. Visiting our website

Only one session cookie is used on our website with the purpose of recording the content of the website. The cookie is stored on your computer for a period of one year, however, it may be deleted from your computer at any time by deleting your browser data.

No other types of cookies - analyzing your consumer behavior, or other cookies with content different from the foregoing - are used by our Web Store.

## VI. Sending direct marketing letters

During registration, you may subscribe to our DM letters. With respect to sending direct marketing letters, the data are provided by the data subjects during the registration process, at the time of marking the box used for consent to receiving DM letters. Registered customers may subscribe to or unsubscribe from DM letters by sending an e-mail to: <a href="mailto:sales@suban.hu">sales@suban.hu</a> and the data subjects may here order or cancel letters with the above contents.

With respect to receiving DM letters, you become a data subject if you subscribe to such letters by way of a declaration of consent.

During sending DM letters, the data controller processes the following data:

Your name - the purpose of processing this information is your personal identification; e-mail address - the purpose of processing this information is sending DM letters.

The date of subscribing to the DM letter; the purpose of processing this information is providing proof

that you actually subscribed to our direct marketing letters. The legal basis

of data processing: the consent of the data subject.

Duration of data processing: Until you unsubscribe from receiving DM letters. (Until the declaration of consent is withdrawn.)

During the subscription to the DM letter - in case it is carried out at the same time of registration - data transfer is carried out to the data processor, whose data are contained in Section III of this Policy. The method of data transfer: recording the subscription during the registration.

The data recorded during subscription are processed electronically, on the servers operated by the contracted partners of the data controller and the data processor.

Your data provided during the subscription to the DM letters at the Web Store may be accessed by the sales staff of our Company, our CEO, and the system administrator of the data processor.

SUBAN Instruments Hungary Co. Data Controller