

## **MALAGROW KFT.**

### **Privacy notice**

Applicable: from 1 July 2018

#### **1. What is the purpose of this privacy notice?**

Malagrow Kft. (mail address: 5000 Szolnok, Újszászi street 38., tax number: 11507941-2-13) is committed to maintaining and improving the quality of its service as well as to processing the personal data and preserving the confidence of its customers. In order to, make our data processing procedure transparent for you as our customer, we have prepared the following privacy notice. Malagrow Kft. keeps the personal data confidential and takes all the reasonable security, technical and organizational measures which ensure the adequate level of data processing. Please study this privacy notice carefully.

This privacy notice also aims at conformity with Regulation (EU) 2016/679 of the European Parliament and of the Council (27 April 2016) and the applicable Hungarian laws (so in particular, Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information).

#### **2. What kind of data processing activities are covered by this notice?**

MALAGROW shall act on the basis of this privacy notice when processing the data of user natural persons (the "Customer") to whom it provides services via webpages [www.hulladekpres.hu](http://www.hulladekpres.hu), [www.malagrow.hu](http://www.malagrow.hu) operated by it and other websites available at other addresses defined there (hereinafter: the "website").

The Customer accepts the provisions of this notice and consents to the data processing pursuant to this notice by visiting and using the website. The provisions of this notice are also applicable for every activity during which our Company requests data from its customers, either for the fulfillment of the contract signed, or in order to obtain their consent for direct marketing purposes.

Our websites and applications are not designed to be used by children under 16. We do not intend to request data from children under 16 on the internet and do not pursue any marketing activities intended for them.

The scope of this notice shall be applicable to the data processing of the customer of MALAGROW Kft., including but not limited to the products supplied to the customers of MALAGROW Kft. and the data processing on the basis of any contractual relationships under the GTC applied by MALAGROW Kft., furthermore the data processing pursuant to any program announced by MALAGROW Kft., for example the MALAGROW Environmental Program.

Unless otherwise provided for by MALAGROW, information contained in this notice are also applicable to applicants who have submitted their CVs for a job at MALAGROW Kft. and requested that their CVs should be retained even if their application is unsuccessful.

Unless otherwise provided for by MALAGROW, information contained in this notice are applicable to natural persons who are not employees of MALAGROW but enter any business premises used by MALAGROW Kft. for any business or other purpose and camera picture may be taken of them there, according to appropriate information provided to them and pursuant to the relevant rules.

#### **3. Definitions – pursuant to the definitions applied by GDPR**

##### **"Controller" (Article 4 (7) of GDPR)**

*Means the 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.*

**“Processing” (Article 4 (2) of GDPR)**

*Means 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.*

**“Personal data” (Article 4 (1) of GDPR)**

*Means 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.*

**“Processor” (Article 4 (8) of GDPR)**

*Means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.”*

**“Profiling” (Article 4 (4) of GDPR)**

*Means 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, behavior, location or movements.”*

**4. Involving a data processor**

Our company use (or may use) processors in the course of data processing as defined herein. Processors are processing data in order to fulfill the data processing targets defined by our Company, on behalf and for the benefit of our Company. The following companies process data on behalf of our Company for the following activities:

- Forwarding companies delivering the products of our Company;
- Marketing companies dealing with the personalization of our Company's newsletters and reaching the target audience, and IT companies dealing with technical background of sending the newsletters;
- Book-keeping companies engaged in supporting the accounting processes of our Company;
- Companies providing business and IT services for our Company; and
- Companies for which our Company renders security, product development services and supporting services for providing higher quality for their customers
- Workforce agencies participating in the selection of applicants for job vacancies advertised by our Company;

Our Company shall not transmit any personal data to third parties for direct marketing purposes, and processes personal data entrusted to it pursuant to the requirements of data security.

**5. What kind of personal data we process?**

The website of our Company provides content available for any internet user without registration. Certain content services and the newsletter function is available for registered users only. Anyone who enters his/her data requested by the website may be a registered user. Registration is free of charge and the lack of registration shall not mean that the unregistered user would have any disadvantages or the unregistered user is excluded from the sale of products.

**5.1 Personal data - provided on the website - acquired pursuant to the Customer's express consent**

5.1.1. If you request an offer on [www.hulladekpres.hu](http://www.hulladekpres.hu) from our Company we shall process the following personal data provided by you:

- Name
- Email address
- Telephone number
- Your interest in machines

The database of [www.hulladekpres.hu](http://www.hulladekpres.hu) (hereinafter: “website”) stores and processes the Customer’s data in order to fulfill the request for offer. MALAGROW is not entitled to transfer such data either for advertising or other purposes – unless the Customer expressly consents to it – however, he/she is entitled to send back the quote via email. [The legal basis of data processing is – upon the customer’s request – preparation for the conclusion of the contract and pursuing MALAGROW’s legitimate interest – Article 6(1) paragraphs b) and f) of GDPR].

**5.1.2** On the form of the order for differ or other accessories regarding the services of MALAGROW the following personal data should be indicated for a successful order:

- Name
- Telephone number
- Email address
- Address for delivery

During the fill out of the form MALAGROW stores and handles the date for the fulfillment of the service, it is not entitled to transfer or use them for advertising or other purposes – unless the Customer expressly agrees, however, it is entitled to send back the quote via email. [The legal basis of the data management is – upon the customers request – the preparation for the conclusion of the contract and the enforcement of the MALAGROW’s legal interest – Article 6 (1) b) and f) points of GDPR].

**5.1.3** If this is made possible on the website, by registering on the website and accepting this Privacy Notice available there (even by clicking on a link), the Customer expressly consents to the Controller’s using his/her personal data for the following purposes: newsletter sending service via email and content service. This means that the Customer expressly and voluntarily consents to the fulfillment of requests for advertising purposes via email or other electronic channels. [The legal basis of the data processing is the Customer’s consent based on Article 6 (1) paragraph a) of GDPR and Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.]

If the legal basis of data processing is the Customer’s voluntarily consent, then the Customer gives the consent to the processing of the above mentioned data after having read and expressly acknowledging this privacy notice (by ticking the relevant checkbox 9 or by using and registering on the website and giving the data in question.

**5.1.4** MALAGROW declares that regarding requests for newsletters and product literature to be delivered by post, it shall consider point 47 of the Preamble of GDPR as prevailing according to which the processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest. [The legal basis of data processing in the case of sending newsletters by post – when requested by the Customer – is preparation for contract conclusion and MALAGROW’s pursuing its legitimate interests according to Article 6 (1) paragraphs b) and f) of GDPR.]

YOUR CONSENT IS VOLUNTARY AND PLEASE NOTE THAT YOU AS CUSTOMER HAVE THE BASUC ENTITLEMENT TO DECIDE AT ANY TIME THAT YOU DO NOT WISH THE DATA PROCESSING CONCERNED ANY MORE AND YOU MAY REQUEST THE ERASURE OF YOUR DATA PURSUANT TO SECTION 10.

## **5.2. Personal data we acquire due to the customer’s express provision of data on the website**

Malagrow Kft. selects and operates IT tools it applies during the rendering of its services so that the data processed shall be:

- available for the authorized persons (availability);
- their authenticity and authentication shall be provided (authenticity of data processing)
- their unchanged state can be verified (data integrity);
- protected against unauthorized access (confidentiality).

MALAGROW Kft. takes appropriate measures to protect data against unauthorized access, alteration, transfer, disclosure, erasure, destruction or accidental loss. MALAGROW takes technical, organizational and institutional

measures for the protection of the security of the data processing and due to this, provides an appropriate level of protection against the risks arising in connection with data processing. MALAGROW retains personal data during data processing, (i) it protects the information, so that only eligible persons should have access to it; (ii) it ensures integrity i.e. protects the accuracy and completeness of the information and the processing method; (iii) it ensures that eligible users can actually access the required information whenever they need it and ensures the availability of the related tools [the legal basis of data processing is the the Customer's consent based on Article 6(1) paragraph a) of GDPR].

### 5.3. Use of Cookies

#### 5.3.1. What are cookies?

Cookies are small packages of information, which are sent by the server of the visited website to the browser and then sent back by the browser to the server. With cookies, the browser of the Customer can be uniquely identified, however MALAGROW Kft. does not identify personalized IP addresses.

The task and type of cookies:

Necessary cookies:

- collect information about visitors and their devices;
- memorize the individual settings of visitors which may be used for example for carrying out online transactions, so there is no need for submitting them again
- make the use of website easier;

Functional cookies:

- provide quality user experience

Convenience cookies:

- make it possible to provide you with personalized advertisements complying with your interest;

#### 5.3.2. MALAGROW Kft. uses the following cookies:

Type of cookie	Name of cookie	ID and type of cookie	Cookie provider	Data processed by the cookie	Purpose of cookie	Time of data processing
Necessary	WP function	wp-settings-{X}	WordPress	Necessary for the use of functions.	Proper functioning.	26 months
		HTTP cookie				
	WP function	wp-settings-time-{X}	WordPress	Necessary for the use of functions.	Proper functioning.	26 months
		HTTP cookie				
	WP GDPR	gdpr[allowed_cookies]	WordPress	Fact of acceptance.	Accepting the conditions required for the operation of the system.	26 months
		HTTP cookie				
Functional	WP GDPR	gdpr[privacy_bar]	WordPress	Fact of acceptance.	Observing the acceptance of Cookies	26 months
		HTTP cookie				
Convenience	Google Analytics	_ga	Google	Url, website address, name of browser, used device (PC, cell-phone, tablet) geographical location, language	Anonym statistics	24 months
		HTTP cookie				

	Google Analytics	_gat,	Google	Url, website address, name of browser, used device (PC, cell-phone, tablet) geographical location, language	Anonym statistics	Deleted at the closing of the Browser
		HTTP cookie				
	Google	SIDCC	Google	Security cookies, in order to protect the data of the user in accordance with the Privacy and Terms of google.com	Security cookie	3 months
		HTTP cookie				
	Google	NID	Google	It helps us to provide you with personalized advertisements on Google in accordance with the <a href="#">Privacy and Terms</a> of google.com	Anonym statistics	6 months
		HTTP cookie				

In case you are accepting the use of convenience cookies during the use of the website, the website of MALAGROW Kft – based on automatized decision-making – uses Google Analytics and Google AdWords, as third party cookies, as well. By using Google Analytics for statistical purposes, Google collects information regarding how you use our websites and based on this, it may presumably display advertisements according to your interest. You may find information about the operation of Google on the following website: <https://policies.google.com/technologies/partner-sites?hl=hu>. [Legal basis of processing – consent of the Customer, Article 6(1) paragraph a) of GDPR] In this case, personal data is not collected by MALAGROW. If you do not grant your consent for the use of convenience cookies, or if you delete it from the settings, you will probably not be informed about the products and advertisements of MALAGROW Kft.

#### 5.4. Data collected based on the express, written consent of the Customer, no on the website

People interested about the products and services of Malagrow Kft. (hereinafter: Data Subject or Customer), or taking part in any of the events organised by MALAGROW have the opportunity to provide their personal data on paper documents like a Data Sheet and Partner Data Sheet (together: “Data Sheet”) issued only for this purpose, in order to be provided with the Data Controller’s business offers and marketing materials. In case of giving consent for data processing for marketing purposes, the following data can be provided (the provision of data indicated with \* is compulsory):

- whole name\*;
- e-mail address;
- postal address (street, address, city, ZIP code)\*;
- phone number;
- size of business/area to be advised on;
- signature\*.

Based on the Customer’s choice, the provision of one data from among the foregoing data: name, signature, or contact data (e-mail address, phone number and postal address) is compulsory and the provision of further data is optional, depending on the decision of the Customer. The consent is always voluntary and it does not have any disadvantageous consequence for the Customer if he/she does not give the consent. If the Customer provides any data then that shall be deemed as a consent to the given manner of contact-keeping. i.e. providing postal address means consent to postal deliveries, and by providing the e-mail address, the Customer expressly gives his/her consent to receiving direct marketing offers, product literature and other contents via e-mail.

##### Partner Data Sheet:

- whole name\*;
- e-mail address;
- postal address (street, address, city, ZIP code)\*;

- phone number;
- name of workplace;
- address of workplace;
- position;
- answer to the question „decision-maker in nutrition supplement issues“;
- size of the area used for growing/ to be advised on, for each type of plants;
- signature\*.

Based on the Data Subject's choice, the provision of one data from among the foregoing data: name, signature, or contact data (e-mail address, phone number and postal address) is compulsory and the provision of further data is optional, depending on the decision of the Data Subject. The consent is always voluntary and it does not have any disadvantageous consequence for the Customer if he/she does not give the consent. If the Customer provides any data then that shall be deemed as a consent to the given manner of contact-keeping. i.e. providing postal address means consent to postal deliveries, and by providing the e-mail address, the Customer expressly gives his/her consent to receiving direct marketing offers, product literature and other contents via e-mail. [Legal basis of data processing is the Customer's consent, and the legitimate interest of MALAGROW, Article 6(1) paragraphs a), b) and f) of GDPR]

YOUR CONSENT IS VOLUNTARY AND PLEASE NOTE THAT YOU AS CUSTOMER HAVE THE BASIC ENTITLEMENT TO DECIDE AT ANY TIME THAT YOU DO NOT WISH THE DATA PROCESSING CONCERNED ANY MORE AND YOU MAY REQUEST THE ERASURE OF YOUR DATA PURSUANT TO SECTION 10.

#### **5.5. Personal data collected by camera surveillance system**

MALAGROW informs the natural persons entering the business premises of MALAGROW that at the seat, premises and branch office of MALAGROW, a camera surveillance system is operated.

The purpose of operating a camera surveillance system is to protect human life, physical integrity, business secrets and property. MALAGROW informs the employees that during the camera observation, the recommendations of the national data protection authority (particularly which are pertaining to the placing and angle of the camera, prohibition of its use in certain rooms, etc.) are fully respected. Furthermore MALAGROW declares that the records concerned – in case of the integrity of the observed place, and in the lack of an incident – are deleted within a maximum of 3 days. [Legal basis of data processing is the Customer's consent, Article 6(1) paragraph a) of GDPR]

#### **5.6. Job application**

The applicant, by providing his/her data (by accepting this Notice by way of reference), acknowledges that MALAGROW may view the public information of the applicant created on social media sites, however it shall refrain from learning limitedly public data. MALAGROW only learns data which are essential from the perspective of establishing employment. MALAGROW shall delete all data of unsuccessful applicants received at the end of the selection process, except if the applicant expressly declared otherwise during the application process. [Legal basis of data processing is the Customer's consent, Article 6(1) paragraph a) of GDPR]

### **6. Other notes pertaining to data processing**

Controller does not verify the personal data provided to it. The person providing the data is liable for the suitability of the data provided. By providing his/her e-mail address, the Customer is liable that only the Customer shall avail itself of the services from the e-mail address provided. With regard to the assumption of this liability, only the user who registered the e-mail address shall bear any liability in connection with log-ins from the email address provided.

### **7. Physical storage of data**

The purpose of automatically recorded data is making statistics, developing IT systems technically, protecting rights of users. The automatically recorded data (log-files) are the following: dynamic IP; address of the user's

computer; depending on settings of the Customers computer, the type of the computer's operation system and browser used by the Customer; activity of the Customer in connection with the website.

Using these data have technical purposes on the one hand – i.e. safe operation and follow-up control of servers - and on the other hand, the Data Controller uses data to make statistics about the use of the website and to analyse the demand of users in order to increase the standard of services. The foregoing data are not suitable for identification of the Customer, and the Data Controller does not connect them with any other personal data.

#### **8. Period of data processing**

THE PROCESSING OF DATA PROVIDED COMPULSORILY DURING THE REGISTRATION STARTS WITH THE REGISTRATION AND LASTS UNTIL ITS DELETION. IN CASE OF NON-COMPULSORY DATA, THE DATA PROCESSING LASTS FROM THE DATE OF PROVISION UNTIL THE DELETION OF THE DATA CONCERNED. THE REGISTERED CUSTOMER MAY REQUEST THE MODIFICATION OR DELETION OF THE DATA COLLECTED ANYTIME DURING THE REGISTRATION BY E-MAIL.

The foregoing provisions do not affect the performance of retaining obligation specified by law (i.e. accounting regulations.) We process data provided by you – in a manner depending on the legal basis of processing – for the following periods:

<b>Legal basis of data processing</b>	<b>Period of storage of data and the manner of determining the period of storage</b>
Data necessary for the performance of the contract	Period required until the statute of limitations of claims arising from contract
IT data (cookies)	Period required for using the given software
Data processed based on consent	Until the expiry of the period specified in the consent or to the extent necessary to achieve the purpose and until the deletion request of the customer

#### **9. Persons entitled to learn the data**

Primarily, the employees of MALAGROW are entitled to learn the data, however they shall not publish them or transfer them to third parties. The transfer of data to a data processor shall not be deemed as transfer to third parties. The engagement of a data processor shall be according to the content of Section 4. The relationship of MALAGROW and the data processor is regulated by contract, a compulsory content of which is the regulation of obligations of the data processor in connection with data security.

#### **10. Rights and possible remedies of the Data Subject, i.e. what are your rights?**

##### **Miscellaneous information (Article 13(2) of GDPR)**

You may request access to personal data pertaining to you, rectification, deletion or restriction of processing of data, and may object against processing of such personal data, and you are entitled to the right to data portability.

In case of data processing based on Article 6(1) paragraph a) or Article 9(2) paragraph a) of GDPR, i.e. data processing based on consent, you may withdraw your consent anytime which does not affect the legitimacy of data processing performed before the withdrawal based on the consent.

If the provision of the personal data is based on contractual obligations and is a precondition of the contract conclusion, you are not obliged to provide personal data, however one of the possible consequences of not providing data is that our Company will not be able to conclude a contract with you, and will not be able to provide services to you based on the contract concluded.

You, as subject of the processing of your data, may assert some rights in accordance with GDPR and other relevant data protection regulations. The following section contains information in connection with your rights as subject of data processing under GDPR. Our Company declares that it will not transfer your data to third countries outside the European Economic Area. Our Company declares that there will be no automated individual decision-making or profiling based on your data.

Based on GDPR, you, as subject of data processing, expressly have the following rights in relation to our Company:

**Right of access by the data subject (Article 15 of GDPR)**

You may request information from us anytime about your processed data. This information includes category of the processed data, purpose with respect to the data processing occurs, source of data, if the data is not collected directly from you and in that particular case, the recipient, to whom we transferred the data. You may copy the data being part of the agreement on a single occasion without charge. If you need more copies, we reserve the right to charge you with a reasonable fee based on the administrative costs of copying. Our Company provides the requested information within 30 days at the latest, reckoned from the filing of request, in writing.

**Right to rectification (Article 16 of GDPR)**

You may request rectification of your data. With respect to the principle of accuracy and data minimisation – we shall take all the necessary actions in order to store and process the correct, all-inclusive, up-to-date and relevant information based on last information the available about you. You may rectify some of your data on our website.

**Right to erasure (Article 17 of GDPR)**

You are entitled to have your data deleted by us on your request, if prescribed so by a legal requirement.

Based on Article 17 of GDPR this is the case, if:

- The personal data is not required for the purpose for which it was collected or processed in any other way;
- You withdraw your consent which was the basis of data processing and the data processing does not have any other legal basis;
- You object to the processing of your data and there is no reasonable priority legitimate reason for the data processing, or you object to the data processing for direct marketing purposes;
- Your personal data was processed unlawfully.

And provided that the data processing is not required for the following purposes:

- For compliance with legal provisions which require us to process your data;
- With special regard to the legally prescribed storage periods;
- For filing, enforcing and protecting legal claims;
- For exercising the right to freedom of expression and access to information ;
- For performing obligations based on EU or member state law applicable to the Data Controller, prescribing the processing of data and for public policy or execution of a task carried out in connection with the public authority vested to the Data Controller;
- For purposes affecting public health, for archiving, scientific and historical research or for statistical purposes, based on public policy or for filing, enforcing and protecting legal claims

If data are to be deleted, our Company shall delete the data within 3 days reckoned from the receipt of the request, in which case they cannot be restored again.

**Right to restriction of processing (Article 18 of GDPR)**

You are entitled to have the data processing restricted on your request

- *If you contend the accuracy of the personal data, you are entitled to restriction for the period which allows to us to verify the accuracy of the personal data;*
- *If the data processing is unlawful, and you oppose the deletion of the data and you request the restriction of processing instead;*
- *If we do not need the personal data for the purpose of data processing, but you require it for filing, enforcing and protecting legal claims;*
- *You objected to data processing and it is under review whether our legitimate interest shall have priority over your interest.*

If the data processing is under restriction, personal data shall only be used with the consent of the data subject for filing, enforcing and protecting legal claims or for protecting rights of other natural persons or legal entities, or for relevant public policy of the EU or any member state.

**Right to data portability (Article 20 of GDPR)**

Upon your request, if it is technically possible, your data shall be transferred to another responsible party. You may exercise this right if the data processing is based on your consent or required for the performance of a contract.



Instead of receiving copies of the data, you may request us to directly transfer the data another data controller indicated by you.

### **Right to object (Article 21 of GDPR)**

You may object to processing of your personal data anytime for reasons in connection with your own circumstances, if the data processing is based on your consent or based on our legitimate interest or that of a third party, so in particular, you may object to the profiling referred to in Article 22 of GDPR, i.e. by deleting cookies. In this case we do not process your personal data anymore. The foregoing does not pertain to cases in which we can prove that the data processing is justified by an obligatory legal reason which has priority over your interest, or when we request it for filing, enforcing and protecting legal claims.

### **Performance deadlines with regard to performance of rights of the data subjects**

We are trying to fulfil any request within 30 days. However this period may be extended for any reason in connection with the right of the subject of data processing or the complexity of your request.

### **Restriction of information during the performance of rights of the data subject**

In special cases, according to legal requirements, we shall not provide you with information about your data. If we refuse your request for information, we shall notify you immediately about the reason of the refusal.

Deletion does not pertain to data processing required by law (i.e. accounting regulations), these data shall be stored for the compulsory period prescribed by law. The Customer may request MALAGROW to delete the personal data pertaining to him/her without delay, if any of the following reasons exists:

- the personal data is no longer required for the purpose for which it was collected or processed in any other way;
- the data subject withdraws his/her consent which was the basis of data processing and the data processing does not have any other legal basis;
- the data subject objects to the data processing and there is no legitimate reason of data processing with priority;
- the personal data was processed unlawfully;
- the personal data shall be deleted for the performance of legal obligations prescribed in EU or member state law applicable to the Data Controller;
- the collection of the personal data occurred in connection with offering of information society services (e.g. newsletter sent to e-mail address).

### **Contact data and your right to lodge a complaint with the supervisory authority**

You may request access to your personal data, may request the rectification / deletion and restriction of data processing, may object to the data processing and/or may exercise your right to data portability.

In relation of the present Privacy Notice, the Data Controller is MALAGROW Kft. In case of possible questions and remarks concerning data processing, please do not hesitate to contact us. Contact: Malagrow Kft., attention: Gergely Malatinszki, Managing Director, postal address: H-5000 Szolnok, Újszászi út 38., email address: hulladekpres@malagrow.hu, or gmalatin@malagrow.hu phone number: 06-56/514-160 or 06-30/326-0035.

Furthermore, you may lodge a complaint with the supervisory authority at the following address: Hungarian National Authority for Data Protection and Freedom of Information as supervisory authority: seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C., postal address: 1530 Budapest, Pf.: 5, phone number: 0613911400.

You are entitled to have effective legal remedy against the legally binding decisions of the supervisory authority pertaining to you.

You are entitled to have effective legal remedy in case the competent supervisor authority does not deal with the complaint or does not inform you for three months about procedural issues or the results reached in connection with the complaint lodged.

The procedure against the supervisory authority may be launched at courts of the member state in which the supervisory authority has its seat.

## **11. Miscellaneous**

Malagrow Kft. obliges itself to take care of the security of data, to take all the reasonable technical measures

which ensure that the data collected, stored and processed are protected and to take all actions in order to prevent their termination, unauthorized use and unauthorized alteration. It is also obliged to notify all those third parties for which it transfers or transmits data to fulfil their obligations similarly.

Malagrow Kft. reserves the right to amend the present Privacy Notice with a prior notification to the Customers. After the entry into force of any amendment, the Customer shall accept the content of the Privacy Notice as amended with implicit conduct by using the services.

Dated Szolnok, 1. July, 2018

György Malatinszki  
Managing Director  
MalaGROW Kft.