



# **Information on Data Processing**

Effective from: 25 May 2018

## 1. The Purpose of the Information, Applicable Legislation

The purpose of this document (hereafter: '**Information**') is to provide appropriate information on the activities carried out by the EUROMEDIC Group (hereinafter: '**Controller**') in connection with the processing of the personal data of natural persons. The contents of this Information are primarily based on the relevant provisions of the following pieces of Hungarian and EU legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, i.e. the General Data Protection Regulation (hereinafter: '**GDPR**');
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: '**Information Act**');
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (hereinafter: '**Electronic Services Act**');
- Act C of 2003 Electronic Communications (hereinafter: '**Electronic Communications Act**');
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising (hereinafter: '**Commercial Advertising Act**');
- Act C of 2000 on Accounting (hereinafter: '**Accounting Act**');
- Act V of 2013 on the Civil Code (hereinafter: '**Civil Code**').

This Information shall always be available and retrievable on the [www.euromedic-hungary.com](http://www.euromedic-hungary.com) website and in hard copy format at the Controller's registered address. Please read this Information carefully.

The Controller warrants that all processing activities performed in connection with its activities meet the requirements laid down in this Information and in relevant legislation.

In order to protect the privacy of its dedicated customers and partners, the Controller attaches particular importance to respecting its clients' rights to informational self-determination. The Controller shall handle personal data confidentially and shall take all the security, technical, and organisational measures necessary to guarantee the security of the data.

## 2. The Controller

The EUROMEDIC Group, as Controller, has the following member companies, which qualify as controllers as set out in this Information. In the case of the different processing events, Controller shall mean the controller indicated for the given processing event.

- **EUROMEDIC-PHARMA Gyógyszernagykereskedelmi Zártkörűen Működő Részvénytársaság** (registered address: 1051 Budapest, Dorottya u 1.; company registration number: 01-10-042887),

- **Euromedic International Hungária Befektetési Korlátolt Felelősségű Társaság** (registered address: 1051 Budapest, Dorottya u 1.; company registration number: 01-09-264946),
- **EUROMEDIC TRADING Szolgáltató Korlátolt Felelősségű Társaság** (registered address: 1051 Budapest, Dorottya u 1.; company registration number: 01-09-463541)
- **Atlas Pharma Gyógyszernagykereskedelmi Korlátolt Felelősségű Társaság** (registered address: 1051 Budapest, Dorottya utca 1.; company registration number: 01-09-282616),
- **Euromedic Technology Kereskedelmi Korlátolt Felelősségű Társaság** (registered address: 1051 Budapest, Dorottya utca 1.; company registration number: 01-09-988367)

Phone: +36 1 8153 100

Email: [info@euromedic-hungary.com](mailto:info@euromedic-hungary.com)

Data protection officer: dr. Németh Vida Marianna lawyer, appointed legal and data protection advisor

### 3. Data Processing Policy

The Controller always intends to follow the following general directives when processing personal data:

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. (**‘lawfulness, fairness and transparency’**)

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. (**‘purpose limitation’**)

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.  
(**‘data minimisation’**)

Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay. (**‘accuracy’**)

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. (**‘storage limitation’**)

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. (**‘integrity and confidentiality’**)

The Controller shall be responsible for, and be able to demonstrate compliance with, the above directives. (**‘accountability’**)

## 4. Definitions

**‘personal data’** 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;

**‘data set’** means all data processed in a single file;

**‘processing’** 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;

**‘restriction of processing’** means the marking of stored personal data with the aim of limiting their processing in the future;

**‘profiling’** 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, behaviour, location or movements;

**‘controller’** 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;

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

**‘recipient’** means 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;

**‘third party’** means 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;

**‘consent’** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**‘disclosure’** means ensuring open access to the data;

**‘data deletion’** means making data unrecognisable in a way that it can never again be restored;

**‘data tagging’** means marking data with a special ID tag to differentiate it;

**‘blocking of data’** means marking data with a special ID tag to indefinitely or definitely restrict its further processing;

**‘data destruction’** means complete physical destruction of the data carrier recording the data;

**‘personal data breach’** means 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;

**‘main establishment’ means**

a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;

b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;

**‘supervisory authority’** means an independent public authority which is established by a Member State;

**‘supervisory authority concerned’** means a supervisory authority which is concerned by the processing of personal data because:

a) the controller or processor is established on the territory of the Member State of that supervisory authority;

b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or

c) a complaint has been lodged with that supervisory authority;

**‘cross-border processing’ means either:**

a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or

b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

**‘relevant and reasoned objection’** means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;

**‘international organisation’** means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries;

**‘third country’** means any State that is not an EEA State,

**‘EEA Member State’** means any Member State of the European Union and any State which is party to the Agreement on the European Economic Area, as well as any State the nationals of which enjoy the same legal status as nationals of States which are parties to the Agreement on the European Economic Area, based on an international treaty concluded between the European Union and its Member States and a State which is not party to the Agreement on the European Economic Area.

## 5. The Legal Basis for Data Processing

Processing shall be lawful only if and to the extent that at least one of the following applies:

- the **data subject has given consent** to the processing of his or her personal data for one or more specific purposes;
- 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;
- processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- processing is necessary in order to **protect the vital interests** of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the **public interest** or in the **exercise of official authority** vested in the controller;
- processing is necessary in order to **validate the vital interests** of the **controller** or of a third person.

The Company Group’s processing activities laid out in the Information are based on the voluntary consent of the data subjects. However, in certain cases the processing, storage, and forwarding of certain parts of the data are required by law, about which we will inform data subjects separately.

We would like to call the attention of all parties disclosing data to the Company that if they provide other than their own personal data, the disclosing party is obligated to obtain the data subject’s consent. The data discloser shall be solely liable for the correctness and compliance of the provided data.

## 6. The <https://rendeles.atlaspharma.hu> Website

The Controller shall enable its contractual partners (legal entities and health care institutions) to place their individual orders within the framework of the delivery contracts concluded between them on the surface available at <https://rendeles.atlaspharma.hu>. The site processes the following personal data: user name, password, and the name of the contractual partner’s contact person.

During the term of the contractual relationship, the Controller shall process the above information in the interest of identifying the contractual partner and of the contractual performance of the order, or if any change takes place in the person of the contact person during the term of the contractual relationship (which the contractual partner shall report to the Controller without delay), until such time. The Controller shall retain the information of orders until the statute of limitations, after which they shall be deleted.

Data Controller: **Atlas Pharma Kft.**

Processor (storage service provider and webserver operator): **Damit Informatika Kft.**

Registered seat: 6725 Szeged, Hópárduc utca 7. fszt. 3.

Phone: +36 1 666 3 777

Email: [let-it@damit.eu](mailto:let-it@damit.eu)

## 7. The <http://euromedic.webzona.hu> Website

The Controller shall enable its contractual partners (legal entities and health care institutions) to place their individual orders within the framework of the delivery contracts concluded between them on the surface available at <https://euromedic.webzona.hu>. The site processes the following personal data: user name, password, and the name of the contractual partner's contact person.

During the term of the contractual relationship, the Controller shall process the above information in the interest of identifying the contractual partner and of the contractual performance of the order, or if any change takes place in the person of the contact person during the term of the contractual relationship (which the contractual partner shall report to the Controller without delay), until such time. The Controller shall retain the information of orders until the statute of limitations, after which they shall be deleted.

Data Controller: **EUROMEDIC-PHARMA Zrt.**

Processor (storage service provider and webserver operator): **T-Systems Magyarország Zrt.**

Registered seat: 1117 Budapest, Budafoki út 56.

Phone: +1400

Email: [TS\\_ugyfelkapcsolat@t-systems.hu](mailto:TS_ugyfelkapcsolat@t-systems.hu)

## 8. The <https://rendeles.euromedic-pharma.hu> Website

The Controller shall enable its contractual partners (legal entities and health care institutions) to place their individual orders within the framework of the delivery contracts concluded between them on the surface available at <https://rendeles.euromedic-pharma.hu>. The site processes the following personal data: user name, password, and the name of the contractual partner's contact person.

During the term of the contractual relationship, the Controller shall process the above information in the interest of identifying the contractual partner and of the contractual performance of the order, or if any change takes place in the person of the contact person during the term of the contractual relationship (which the contractual partner shall report to the Controller without delay), until such time. The Controller shall retain the information of orders until the statute of limitations, after which they shall be deleted.

Data Controller: **EUROMEDIC-PHARMA Zrt.**

Processor (storage service provider and webserver operator): **Damit Informatika Kft.**

Registered seat: 6725 Szeged, Hópárduc utca 7. fszt. 3.

Phone: +36 1 666 3 777

Email: [let-it@damit.eu](mailto:let-it@damit.eu)

## 9. The Online Shop Operated on the <https://www.emdirect.hu> Site

The Controller operates an online shop at the <https://www.emdirect.hu> address (hereinafter: 'Online

**Shop'**), through which it sells the items indicated in the Online Shop.



## 9.1. Cookies

In order for the Controller's website to work as efficiently as possible, the Controller may use cookies. Cookies allow a website to recognise recurring visitors and enable the Controller to collect data on the behaviour of its users, for example the country from which you are browsing the website, the browser software and operating system you use, your IP address, the webpages you visited within the site, and the functions you used.

The segmented data collected for remarketing purposes qualifies as profiling under Article 4 point 4 of the GDPR. The logic applied during profiling: Profiling is performed on the basis of the interactions between the website's visitors and the products they viewed, placed into their baskets, or purchased. These profiles are included in remarketing lists used for direct marketing and personalisation. The effects of profiling on data subjects: the displaying of personalised marketing messages developed on the basis of the activities of data subjects.

The cookie is a packet of information with variable content sent by the webserver that is stored on the user's computer and allows the querying of certain data. Cookies are short text files that viewed websites store in the user's browser on the user's computer, mobile phone, or other device used for browsing the internet. Cookies do not connect to your systems and do not cause any damages to your files.

Cookies can be 'persistent' or 'session' cookies. Persistent cookies are stored by the web browser until a specific date, unless the user deletes those. However, browsers do not store session cookies, which are automatically deleted when the browser is closed. Cookies are 'passive', i.e. they do not contain any executable files, viruses, or spyware, and they cannot access data on the user's hard drive. Please note that these cookies are in themselves incapable of identifying the visitor personally.

The Online Shop uses the following cookies: 3<sup>rd</sup> party (google.hu / google.com; facebook.com; addthis.com; doubleclick.net), and PHPSESSID (a cookie used to manage the PHP session), LiveChat cookie, Google analytics, HotJar service cookie, AddThis service cookies, Mouseflow analytics cookie, the Symfony framework's own cookie.

You can delete cookies from your computer or can also set your browsers to refuse cookies at any time.

## 9.2. Registration

Users need to register in order to be able to place an order in the Online Shop. After registration, the Data Controller processes the following personal data: email address, name, and telephone number. The purpose of processing is shopping in the Online Shop, keeping records of customers, differentiating between customers, filling orders, documenting purchases, and contacting customers.

The legal basis for data processing is the voluntary consent you give when registering. The duration of processing is 5 years from the time of your last activity or until you revoke your consent (whichever comes first).

You can also place orders by logging in to your Facebook or Google account. In this case, the account information will be synchronised to the extent necessary for identification. (name, email address, phone number, address)

### 9.3. Performance of Contracts Concluded via the Online Shop, Payment, Delivery, Billing, and Accounting Obligations

When you shop in the Online Shop, the Controller will request that in addition to the data provided at the time of registration, you also provide the following information so it can fill the order (deliver the order and issue the bill), document the purchase and payment, and comply with its accounting obligations: billing address and delivery address. The Controller stores such data for 5 years from the time of the performance/termination of the contract; in line with the provisions of Section 169 (2) of the Accounting Act, the Controller stores accounting documents and the documents on which they are based for 8 years so it can comply with its accounting obligations. The legal basis for data processing: the fulfilment of the contract, Section 13/A of the Electronic Services Act, Section 169 (2) of the Accounting Act, and Section 6 (5) of the Commercial Advertising Act.

When using a bank card to provide payment online, the Website is not able to access your card or bank details. Instead, it forwards you to OTP Bank's online payment website. More information on the website is available here: <https://www.emdirect.hu/emd/online-fizetes>.

To be able to deliver the ordered products, the Controller discloses your name and delivery address to GLS General Logistics Systems Hungary Csomag-Logisztikai Kft. The courier's Information on Data Processing is available here: <https://gls-group.eu/HU/hu/home>.

### 9.4. Newsletter and Marketing

If during registration (or thereafter) you grant your explicit consent by checking the appropriate checkbox on the Website, the Controller may process your name and email address in the interest of more targeted service, direct marketing, and to provide you with current information and offers (newsletter). At any time, you can withdraw your consent for your data to be processed for such purposes under the Website's 'Profile' menu point. If you do not withdraw your consent, the Controller will process these data for the above purposes for 5 years from the time of the last update of such the data.

Newsletters are sent out with the use of the MailChimp application.

### 9.5. Complaint Management and Customer Service

The Controller records the incoming and outgoing calls to and from the number +36 1 815 3180 to be used subsequently as evidence. The purpose of such evidence is to validate the rights of customers and the Controller, to provide evidence to settle and possible disputes, to provide subsequent evidence (including for agreements), and quality assurance. The legal basis for data processing is the voluntary consent of the data subject, which the data subject gives by initiating the call. The range of data processed: identification number, phone number, the dialled number, date of call, a recording of the telephone conversation, and other personal data provided during the conversation. The recording shall be assigned a unique identifier and stored for five years.

The Controller shall also draw up records of any complaints, which records (or, in the case of complaints submitted in writing, the written complaint) shall be kept for five years together with the substantive reply provided to the complaint, in line with Section 17/B (3) of Act CLV of 1997.

## 9.6. Social Networking Site Plug-Ins

The Website may also include integrated modules ('plug-ins') of Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA; hereinafter: 'Facebook'). The related services are provided by Facebook. The integrated modules inform Facebook about the websites you visit. If you are logged in to your account while browsing the website, Facebook can compare the information you are interested in (i.e. the information you access) with your user account. If you use integrated modules (i.e. make comments), your browser will directly forward the information to Facebook for retention. If you share the contents of your basket on Facebook, this information will also be forwarded.

You can find more information on Facebook's data protection policy at the following link: <http://www.facebook.com/policy.php>

If you would like to prevent the Service Providers from linking your visit to our website with your user account, log out from your account before visiting our website.

## 9.7. Contact

The Website provides an opportunity for customers to contact the Controller directly with the use of pop-up dialog boxes. The Controller processes the name, email address, and message written in the dialog box on the basis of the data subject's consent (which it expresses by submitting such data) for communication purposes. The duration of processing is 5 years from the time of your last activity or until you revoke your consent (whichever comes first).

## 9.8. Controller and Processors for the Purposes of this Point Controller:

### **EUROMEDIC TRADING Szolgáltató Kft.**

Processors:

Storage service provider and webserver operator: **Loginet Systems Kft.**

Registered seat: 1221 Budapest, Vihar utca 5. Building D 4th floor 15.

Phone: +36 1 208 0015

Email: [info@loginet.hu](mailto:info@loginet.hu)

Courier service: **GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.**

Registered seat: 2351 Alsónémedi, GLS Európa utca 2. Phone: +36 1 802 0265

Email: [info@glshungary.com](mailto:info@glshungary.com)

For the newsletter sending application **The Rocket Science Group, LLC d/b/a MailChimp**

Registered seat: 512 Means St., Suite 404, Atlanta, GA 30318, USA Phone: +1 678 999 0141

Email: [info@mailchimp.com](mailto:info@mailchimp.com)

The Controller forwards the data subject's personal data only to recipients established in the European Union or that provide suitable guarantees (e.g. EU-US Privacy Shield) that the processing they perform complies with the requirements of the GDPR. A transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. Such a transfer shall not require any specific authorisation.

## 10. The <http://www.euromedic-hungary.com> Website

In order for the Controller's website to work as efficiently as possible, the Controller may use cookies. Cookies allow a website to recognise recurring visitors and enable the Controller to collect data on the behaviour of its users, for example the country from which you are browsing the website, the browser software and operating system you use, your IP address, the webpages you visited within the site, and the functions you used.

Cookies can be 'persistent' or 'session' cookies. Persistent cookies are stored by the web browser until a specific date, unless the user deletes those. However, browsers do not store session cookies, which are automatically deleted when the browser is closed. Cookies are 'passive', i.e. they do not contain any executable files, viruses, or spyware, and they cannot access data on the user's hard drive. Please note that these cookies are in themselves incapable of identifying the visitor personally.

The above website uses the following cookies: Security cookies, process cookies, and the cookies required for Google maps.

You can delete cookies from your computer or can also set your browsers to refuse cookies at any time.

The above website may include the integrated modules ('plug-ins') used by Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA; hereinafter: 'Facebook'), Twitter Inc. (1355 Market St, Suite 900, San Francisco, CA 94103, USA; hereinafter: 'Twitter'), LinkedIn Corporation (2029 Stierlin Court, Mountain View, CA 94043, USA; hereinafter: 'LinkedIn'), and Google+ (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) (hereinafter jointly: Service Providers). The related services are provided by the Service Provider. The integrated modules inform the Service Providers about the websites you visit. If you are logged in to your account while browsing the website, the Service Providers can compare the information you are interested in (i.e. the information you access) with your user account. If you use integrated modules (i.e. make comments), your browser will directly forward the information to the Service Providers for retention.

You can find more information on Facebook's data protection policy at the following link: <http://www.facebook.com/policy.php>

You can find more information on Twitter's data protection policy at the following link: <https://twitter.com/privacy>

You can find more information on LinkedIn's data protection policy at the following link: <https://www.linkedin.com/legal/privacy-policy>

You can find more information on Google+'s data protection policy at the following link: <https://policies.google.com/privacy>

If you would like to prevent the Service Providers from linking your visit to our website with your user account, log out from your account before visiting our website.

By clicking on the icon in the website header, visitors will be redirected to the online shop at <https://www.emdirect.hu>, where data processing takes place as outlined in point 9.

Data Controller: **Company Group**

Processors:

Storage service provider and webserver operator: **Tárhely.Eu Szolgáltató Kft.**

Registered seat: 1144 Budapest, Ormánság utca 4. 10th floor 241.

Phone: +36 1 789 2 789

Email: [support@tarhely.eu](mailto:support@tarhely.eu)

Website operator: **Merlin Communications Kft.**

Registered seat: 1119 Budapest, Fehérvári út 85. Building C, 4th floor

Phone: +36 1 336 2700

Email: [twendler@merlin.hu](mailto:twendler@merlin.hu)

## 11. Communication with Offline Contractual Partners

The members of the Company Group receive the personal data of the contact persons of their legal entity contractual partners (thus especially their names, email addresses, and phone numbers) in the legitimate interests of the contractual partner and process such data for the purposes of communication in the interest of contractual performance. If any changes take place to the contact person's data or person, the contractual partner shall promptly inform the member of the Company Group with which it is in a contractual relationship. In such cases, the Controller shall modify/delete the contact person's data accordingly. In view of the fact that the personal data of the contact person form part of the contract text, the Controller shall retain those as part of the contract for the general statute of limitations calculated from the performance/termination of the contract, i.e. for 5 years, or for 8 years in the case of data required to substantiate accounting documents, in line with Section 169 (2) of the Accounting Act.

## 12. Sending Newsletters to Offline Contractual Partners

If you, as the Controller's contractual partner or its representative or relative, grant your explicit consent by email or by other means, the Controller may process your name and email address in the interest of more targeted service, direct marketing, and to provide you with current information and offers (newsletter). At any time, you can withdraw your consent for your data to be processed for such purposes by sending an email including your request to [info@euromedic-hungary.com](mailto:info@euromedic-hungary.com).

Data Controller: **EUROMEDIC TRADING Szolgáltató Kft., Euromedic Technology Kft.**

## 13. Overview of Processing Activities

Activity	The sphere of processed data	Data processing purpose	Legal grounds for data processing	Processor	Retention duration
The <a href="https://rendeles.atlaspharma.hu">https://rendeles.atlaspharma.hu</a> website Atlas Pharma Kft.	username, password, name of the contractual partner's contact person	Fulfilling orders placed as part of a delivery contract	Contract performance Article 6(1)(b) of the GDPR Legitimate interest Article 6(1)(f) of the GDPR	Damit Informatika Kft..	The term of the contract or, if it is sooner, the change in the person of the contact person, for 5 years from the time of the end of the legal relationship in connection with the data used to certify fulfilment of the order

<p>The http://euromedic.webz ona.hu website</p> <p>EUROMEDIC- PHARMA Zrt.</p>	<p>username, password, name of the contractual partner's contact person</p>	<p>Fulfilling orders placed as part of a delivery contract</p>	<p>Contract performance</p> <p>Article 6(1)(b) of the GDPR</p> <p>Legitimate interest</p> <p>Article 6(1)(f) of the GDPR</p>	<p>T-Systems Magyarország Zrt.</p>	<p>The term of the contract or, if it is sooner, the change in the person of the contact person, for 5 years from the time of the end of the legal relationship in connection with the data used to certify fulfilment of the order</p>
<p>The https://rendeles.eurom edic-pharma.hu website</p> <p>EUROMEDIC- PHARMA Zrt.</p>	<p>username, password, name of the contractual partner's contact person</p>	<p>Fulfilling orders placed as part of a delivery contract</p>	<p>Contract performance</p> <p>Article 6(1)(b) of the GDPR</p> <p>Legitimate interest</p> <p>Article 6(1)(f) of the GDPR</p>	<p>Damit Informatika Kft..</p>	<p>The term of the contract or, if it is sooner, the change in the person of the contact person, for 5 years from the time of the end of the legal relationship in connection with the data used to certify fulfilment of the order</p>
<p>The Online Shop Operated on the https://www.emdirect. hu website</p> <p>EUROMEDIC TRADING Szolgáltató Kft.</p>	<p>email address, name, phone number</p>	<p>Taking orders</p>	<p>Consent</p> <p>Article 6(1)(a) of the GDPR</p>	<p>Loginet Systems Kft.</p>	<p>5 years from the last activity or until consent is withdrawn (whichever comes first)</p>
<p>Filling orders placed in the online shop, payment, delivery, billing, and accounting obligations</p> <p>EUROMEDIC TRADING Szolgáltató Kft.</p>	<p>billing address and delivery address</p>	<p>Fulfilling orders</p>	<p>Contract performance</p> <p>Article 6(1)(b) of the GDPR</p> <p>Section 13/A of the Electronic Services Act</p> <p>Section 169 (2) of the Accounting Act</p> <p>Section 6 (5) of the Commercial Advertising Act</p>	<p>Loginet Systems Kft.</p> <p>GLS General Logistics Systems Hungary Csomag- Logisztikai Kft.</p>	<p>5 years from the performance/terminati on of the contract and 8 years in the case of accounting data</p>
<p>Online Shop newsletter, marketing</p> <p>EUROMEDIC TRADING Szolgáltató Kft.</p>	<p>email address, name</p>	<p>Contact for direct marketing purposes, information</p>	<p>Consent</p> <p>Article 6(1)(a) of the GDPR</p>	<p>MailChimp</p>	<p>Unless consent is withdrawn, 5 years from the time of the last update of data</p>

Online Shop complaint management and customer service  EUROMEDIC TRADING Szolgáltató Kft.	identification number, phone number, the dialled number, date of call, a recording of the telephone conversation, other personal data provided during the	Guarantee of validation of rights, quality assurance	Consent  Article 6(1)(a) of the GDPR	-	5 years
Online Shop communications  EUROMEDIC TRADING Szolgáltató Kft.	email address, name	Contact	Consent  Article 6(1)(a) of the GDPR	Loginet Systems Kft.	5 years from the time of last activity or until consent is withdrawn (whichever comes first)
Contract contact persons  Company Group	name, email address, phone number	Contract performance	Contract performance  Article 6(1)(b) of the GDPR Legitimate interest Article 6(1)(f) of the GDPR	-	5 years from the performance/termination of the contract and 8 years in the case of accounting data
EUROMEDIC TRADING Szolgáltató Kft.	email address, name	Contact for direct marketing purposes, information	Consent  Article 6(1)(a) of the GDPR	-	Withdrawal of consent
EUROMEDIC Technology Kft.	email address, name	Contact for direct marketing purposes, information	Consent  Article 6(1)(a) of the GDPR	-	Withdrawal of consent

## 14. Rights of Data Subjects and Possibilities for Enforcement

You can exercise your rights listed in the following points by way of submitting a written or oral request to the Controller. Chapter II of this Information contains the Controller's contact information.

### 14.1. Information on the Processing of Your Personal Data

Upon the data subject's request the Controller shall provide information concerning the data relating to him, including those processed by a data processor on its behalf or according to his/her notice, the sources from where they were obtained, the purpose, grounds and duration of processing, the name and address of the data processor and on its activities relating to data processing, and the conditions and effects of the data incident and measures taken with a view to eliminate them and -in case of data transfer - the legal basis and the recipients.

The Controller must comply with requests for information without any delay, and provide the information requested in an intelligible form, in writing at the data subject's request, within not more than 25 days.

## 14.2. Access to Personal Data

The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that 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 these 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 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. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy shall not adversely affect the rights and freedoms of others.

## 14.3. Right to Rectification

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.



## 14.4. Right to Erasure ('Right to be Forgotten')

The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds 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 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 the offer of information society services.

Where the Controller has made the personal data public and is obliged pursuant to the above to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such Controllers of any links to, or copy or replication of, those personal data.

Erasure of the data may not be requested to the extent that processing is necessary: for exercising the right of freedom of expression and information; 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; for reasons of public interest in the area of public health; for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or for the establishment, exercise or defence of legal claims.

## 14.5. Right to Restriction of Processing

The data subject shall have the right to obtain from the Controller 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) the Controller 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 pending the verification whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted as set out above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing shall be informed by the Controller before the restriction of processing is lifted.

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

## 14.6. Right to Data Portability

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

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

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of this right shall be without prejudice to the right to erasure. That right shall not apply to 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. The right referred to in this paragraph shall not adversely affect the rights and freedoms of others.

## 14.7. Right of Withdrawal

The data subject shall have the right to withdraw the consent given for the processing of its data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

## 14.8. The Right to Lodge a Complaint with a Supervisory Authority

In the interest of the enforcement of the right to the protection of personal data, a complaint be submitted to the Hungarian National Authority for Data Protection and Freedom of Information, which may launch data protection administrative proceedings. If the Authority has conducted an investigation launched upon notification before the administrative proceedings for data protection, the notifier shall be informed on the opening of such proceedings, including its conclusion as well.

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information]

Registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Phone: +36 1 391 1400

Fax: +36 1 391 1410

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <http://www.naih.hu>

## 14.9. Right to Apply to Court

Data subjects whose rights have been violated may turn to a court of law. The court shall hear such cases in priority proceedings. The burden of proof to show compliance with the law lies with the Controller. The action shall be heard by the competent tribunal. If so requested by the data subject, the action may be brought before the tribunal in whose jurisdiction the data subject's home address or temporary residence is located. Any person otherwise lacking legal capacity to be a party to legal proceedings may also be involved in such legal proceedings. The Hungarian National Authority for Data Protection and Freedom of Information may intervene in the action on the data subject's behalf.

When the court's decision is in favour of the plaintiff, the court shall order the Controller to provide the information, to rectify, block or erase the data in question, to annul the decision adopted by means of automated data-processing systems, to respect the data subject's objection.

The court may order publication of its decision, indicating the identification data of the Controller as well, where this is deemed necessary for reasons of data protection or in connection with the rights of large numbers of data subjects under protection by this Act.

## 15. Information on Personal Data Breaches

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall communicate the personal data breach to the data subject without undue delay.

The communication to the data subject shall describe in clear and plain language the nature of the personal data breach and contain at least the name and contact details of the data protection officer, the likely consequences of the personal data breach, and the measures taken or proposed to be taken by the 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 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 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 a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

If the Controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the required conditions are met.

## 16. Final provisions

Please note that courts, public prosecutors, investigating authorities, authorities dealing with administrative offences, administrative authorities, the Hungarian National Authority for Data Protection and Freedom of Information, and, based on the authority provided by law, other bodies may contact the Controller for the purposes of receiving, disclosing, or forwarding information, or for necessary documents.

The Controller shall disclose personal data to the authorities only to the extent and to the degree that is essential for fulfilling the purpose of such communication, and only if the authority has precisely indicated the purpose and the sphere of data of the request.

At the time of recording such data, we provide detailed information on any processing not included in this Information. The Controller maintains the right to amend this Information at any time at its own discretion. The amendments to the Information shall enter into effect as of their publication on the websites listed in this Information. We accordingly recommend that you keep current on the contents of the amendments at regular intervals.