# 4iG Telecommunications Holding Private Limited Company

# Information notice

# 1. Introduction

4iG Telecommunication Holding Private Limited Company (hereinafter: 4iG Telecommunication Holding Ltd.) provides the following information, in accordance with the provisions of the General Data Protection Regulation (hereinafter: GDPR), regarding the data processing activities carried out by it, including the exercise of data subjects' rights, as well as the available remedies.

# 2. Name and contact details of the data controller and data protection officer

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| **Name** | 4iG Telecommunication Holding Ltd. |
| **Registered office** | 1013 Budapest, Krisztina krt. 39. |
| **Postal address** | 1013 Budapest, Krisztina krt. 39. |
| **E-mail** | sajto@4ig.hu |
| **Phone** | +36 1 270 7600 |
| **Website** | https://4igtavkozlesiholding.hu |

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| **Adatvédelmi tisztviselő** | ARB Privacy Kft. |
| **Postacím** | 1013 Budapest, Krisztina krt. 39. |
| **E-mail** | dpo-telcoholding@4ig.hu |

# 3. Rules for exercising data subjects' rights

***How can data subjects exercise their rights?***

Data subjects may exercise the rights granted by the GDPR at any time by submitting a request – verbally, in writing or electronically – via any of 4iG Telecommunication Holding Ltd.'s contact details.

***What does the right of access grant you?***

The data subject is entitled at any time to request confirmation as to whether 4iG Telecommunication Holding Ltd. is processing his or her personal data. The data subject has the right and the opportunity at any time to find out what data the controller holds about him or her and under what circumstances, and may also request a copy of his or her personal data. A copy of the personal data may be made available to the data subject in a widely used, machine-readable format (PDF/XML) or in a printed version on paper. The copy is provided free of charge.

***What does the rectification of personal data mean?***

The data subject may request the rectification of inaccurate personal data concerning them, or the completion of incomplete personal data. Where the data cannot be rectified or supplemented due to a lack of additional information, the data controller shall restrict the processing of the data subject's personal data and temporarily suspend all operations carried out on such data, with the exception of storage.

***When can the right to erasure be exercised?***

The data subject may request the erasure of personal data relating to them if 4iG Telecommunication Holding Ltd. no longer requires such data, or if the data subject has concerns regarding the lawfulness of the processing of their data. Where there is an obligation to erase the personal data being processed, 4iG Telecommunication Holding Ltd. will cease processing the data and will erase or anonymise it.

***What does the right to restriction of processing mean?***

The data subject may request the restriction of the processing of personal data relating to them if they have concerns regarding the lawfulness of the processing and request that the data be restricted instead of erased, or if 4iG Telecommunication Holding Ltd. no longer requires the data, but the data subject requires it for the establishment, exercise or defence of legal claims. During the period of restriction, 4iG Telecommunication Holding Ltd. shall not carry out any operations on the personal data, with the exception of storage. The restriction may only be lifted in exceptional cases as defined in the GDPR, of which 4iG Telecommunication Holding Ltd. shall inform the data subject in advance.

***What are the circumstances in which the right to object applies?***

The data subject may object to the processing of their personal data if such processing is based on the data controller's legitimate interests. In such cases, 4iG Telecommunication Holding Ltd. will block the personal data for a period sufficient to determine whether there is a compelling legitimate ground that necessitates the continuation of the processing (such as where the data controller's interests, rights or freedoms take precedence, or where the use of the data is necessary for the establishment, exercise or defence of legal claims). In the absence of such grounds, 4iG Telecommunication Holding Ltd., as the data controller, will cease data processing and erase or anonymise the data.

***What are the options for exercising legal rights after the death of the person concerned?***

Within five years of the data subject's death, the rights to access, rectification, erasure, restriction of processing and the right to object may be exercised by the person authorised by the data subject through an administrative order or a declaration made to 4iG Telecommunication Holding Ltd. in a public document or a private document having full probative value. In the absence of such a declaration, the rights to rectification and to object, as well as – where the processing was unlawful during the data subject's lifetime or the purpose of the processing has ceased upon the data subject's death – the rights to erasure and to restriction of processing may be exercised by a close relative of the data subject (spouse, direct relative, adopted / step- / foster child, adoptive / step- / foster parent, sibling)The person exercising the rights is required to prove the fact and date of the data subject's death by means of a death certificate or a court order, and to prove his or her own identity – and, where applicable, his or her status as a close relative – by means of an official document. Thereafter, that person shall be entitled to the rights and subject to the obligations established in respect of the data subject.

# 4. Legal remedies

If 4iG Telecommunication Holding Ltd. has processed the personal data of data subjects contrary to the relevant legislation, or if it has failed to comply, or has complied inadequately, with a request to exercise a right, the data subject is entitled to lodge a complaint with the data protection supervisory authority using the contact details below:

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| **Name** | National Authority for Data Protection and Freedom of Information |
| **Registered office** | 1055 Budapest, Falk Miksa utca 9-11. |
| **Postal address** | 1363 Budapest, PO Box. 9. |
| **E-mail** | ugyfelszolgalat@naih.hu |
| **Phone** | +36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391-1400 |
| **Fax** | +36 (1) 391-1410 |

# 5. Data processing activities

***How does 4iG Telecommunication Holding Ltd. process the personal data of representatives of its business partners?***

4iG Telecommunication Holding Ltd. processes the contractual data of representatives of its contracting partners and of individual entrepreneurs for the purpose of entering into the relevant contract. Data processing is carried out on the basis of 4iG Telecommunication Holding Ltd.'s legitimate interest in the conclusion and performance of the contract [Article 6(1)(f) of the GDPR], and, in the case of individual entrepreneurs, on the basis of the conclusion and performance of the contract [Article 6(1)(b) of the GDPR]. 4iG Telecommunication Holding Ltd. shall process and store the data processed in this manner for a period of 5 years following the termination of the contract [the limitation period as set out in Section 6:22(1) of Act V of 2013 on the Civil Code (hereinafter: the Civil Code)].

***How does communication with business partners take place?***

4iG Telecommunication Holding Ltd. and the partner shall keep each other informed of facts and circumstances relating to the contract throughout the duration of the legal relationship. In doing so, 4iG Telecommunication Holding Ltd. shall communicate with the persons designated as contact persons by the partner's representative, for which purpose it shall record and use information relating to the data subject. Data processing is carried out on the basis of 4iG Telecommunication Holding Ltd.'s legitimate interest in the conclusion and performance of the contract [Article 6(1)(f) of the GDPR], and, in the case of a individual entrepreneur, on the basis of the conclusion and performance of the contract [Article 6(1)(b) of the GDPR]. 4iG Telecommunication Holding Ltd. will process the data until the contract is terminated.

***What are the record-keeping obligations under the accounting rules?***

In accordance with our legal obligation under the statutory provisions on accounting, 4iG Telecommunication Holding Ltd. is required to retain accounting documents directly and indirectly supporting the accounting records – including general ledger accounts, analytical and detailed records – in a readable form and in a manner that allows them to be retrieved by reference to the accounting records [Section 169(2) of Act C of 2000 on Accounting (hereinafter: the Accounting Act) and Article 6(1)(c) of the GDPR]. This obligation applies for a period of 8 years [the retention obligation under Section 169(2) of the Accounting Act].

# 6. Recipients

***Which data processors are involved in data processing?***

The following data processors carry out their activities in connection with specific data processing operations on behalf of and for the benefit of the data controller, pursuant to a contract concluded with 4iG Telecommunication Holding Ltd.:

a) Microsoft Ireland, in relation to the O365 service;
b) 4iG Plc. in relation to outsourced services (the provision of legal, procurement, communications and IT services);
c) One Hungary Ltd., in connection with the web hosting service for the website of 4iG Telecommunication Holding Ltd.;
d) Elementary Interactive Ltd. in relation to the development and maintenance of the website

***Does data get sent to a third country?***
Personal data may be transferred by Microsoft Ireland Ltd., the provider of the Office 365 email service, acting as a data processor, to the United States or any other country in which Microsoft Corporation, its subsidiaries or its subcontractors operate. Data transfers by Microsoft Ireland Ltd. are carried out in

accordance with the provisions of Chapter V of the GDPR. Microsoft Corporation is included on the list under the EU-US Data Privacy Framework, which, according to the European Commission's Implementing Regulation of 10 July 2023, ensures an adequate level of protection for personal data.