

## INFORMATION ON DATA PROCESSING

### I. Preamble

As the right of informational self-determination is the fundamental right of every natural person, set out in the Fundamental Law of Hungary, therefore throughout its processes the Data Controller shall only control any data pursuant to the provisions of the effective legislation.

Personal data can only be controlled with the purpose of exercising a right or performing an obligation. The use of the personal data controlled by the data controller for a private purpose is prohibited. Any data control must always be in compliance with the basic principle of purpose limitation.

The Data Controller controls any personal data only with the purpose the data have been requested for, to exercise a right and to perform an obligation, for the minimal extent and time necessary for achieving such purpose. At every stage data controlling must be in line with the purpose – and in case the purpose of data controlling has ceased, or the control of data is otherwise illegal, then the data are erased. The data are erased by the employee of the Data Controller who is de facto handling the data. The erasure of the data may be checked by the person exercising the rights of the employer over the employee or the data protection officer.

The Data Controller controls personal data only with the previous consent – in the case of special categories of personal data a written consent – of the data subject, or based on a law or enabling legislation.

In every case, before collecting the data, the Data Controller informs the data subject about the purpose of data controlling, as well as the legal basis of such data controlling.

The employees processing the data at the organizational units of the Data Controller and the employees of organizations participating in the data processing on behalf of the Data Controller are obliged to keep such personal data as a trade secret. Persons handling and having access to the personal data shall be obliged to make a **Declaration of Confidentiality**.

The obligations of natural or legal persons, public authorities, agencies or any other bodies performing data processing on behalf of the Data Controller shall be set out in the contract for works concluded with the Data Controller.

### II. Information on the Data Controller

- Name of the data controller: eBrókerház Befektetési Szolgáltató Zrt.
- Address of the data controller: 1054 Budapest, Szabadság tér 14.
- Telephone number of the Data Controller: +36-1-880-8400
- Fax of the data controller: +36-1-880-8440

### III. Information on the data protection officer:

- Telephone number of the data protection officer: +36-1-880-8408
- E-mail address of the data protection officer: [dataprotection@iforex.hu](mailto:dataprotection@iforex.hu)

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Metropolitan Court of Budapest, Company reg. no.: 01-10-044141

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### IV. Information on the individual cases of data controlling

#### IV. 1.

In the case of the consent of the data subject the Data Controller collects the data subject's contact data by using the registration forms located on the webpages operated by the Data Controller and the so-called landing pages used by it in its marketing activities. The Data Controller does not transfer the personal data to any third person, neither within or outside the European Union. The Data Controller controls the data collected for communication with the data subject until the deletion request of the data subject, or for 5 years after their provision.

In case the data subject does not give their consent to the controlling of their data listed above, that is, they do not fill in the registration form, or they do not transfer such registration form to the Data Controller, then in such a case the Data Controller will not be able to communicate with the data subject and will not be able to provide them with detailed information concerning the nature of the services provided by the Data Controller.

Purpose of data processing:	Communication with potential clients
Legal basis of data processing	Consent of the data subject
Categories of data subjects	Natural persons registering via the webpages operated by eBrókerház Zrt. ( <a href="http://www.iforex.hu">www.iforex.hu</a> ; <a href="http://www.iforex.cz">www.iforex.cz</a> , <a href="http://en.iforex.hu">en.iforex.hu</a> ), or its marketing interfaces (landing page)
Categories of personal data	name, telephone number, electronic mailing address (e-mail address)
Categories of recipients	No
Data transfer to third countries	No
Envisaged time limit for erasure	Until the deletion request of the data subject, max. 5 years - the access to the IT system storing and processing the data is restricted and controlled; - in connection with access the division of responsibilities takes place along the principle of knowledge necessary and enough for storage, processing and transfer, the circle of those with the right of access is reviewed on a regular basis
Technical and organizational measures	; - the IT system storing and processing the personal data has an appropriate network border protection and segmentation, and also the protection of network communication (https) is ensured; - the regular saving and the storage of savings of the database storing and processing the personal data is

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controlled and is in compliance with the best practices of the industry;

- the business continuity planning (BCP) of the IT systems storing and processing the personal data is ensured, and in the case of a disaster the disaster recovery plans (DRP-s) are ensured, they are tested and controlled on a regular basis;

- each activity in connection with the control and processing of personal data is completely recorded, and it is ensured that such records are kept confidential, are available and are intact;

- the IT system is protected against malicious codes, the protection is up-to-date and is updated regularly;

- the identification, authentication and password management of the user having an access to the personal data is restricted and controlled, in view of the best practices in the industry;

### IV.2.

The Data Controller informs the registered users about the investment services and current issues and promotions in connection with the funds provided by the Data Controller by sending marketing messages.

The Company controls the data – based on the consent of the clients – until the client providing their personal data asks for the deletion of their data by unsubscribing from the newsletter, or by sending an e-mail to [dataprotection@iforex.hu](mailto:dataprotection@iforex.hu). If the client asks for it, the Data Controller will irreparably terminate its contact with the data subjects.

Purpose of data processing	Data processing with marketing purposes
Legal basis of data processing	Consent of the data subject
Categories of data subjects	Natural persons registering with the purpose of electronic communication with eBrókerház Zrt.
Categories of personal data	electronic mailing address (e-mail address)
Categories of recipients	No
Data transfer to third countries	No
Envisaged time limit for erasure	Until the deletion request of the data subject, max. 5 years

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### Technical and organizational measures

- the access to the IT system storing and processing the data is restricted and controlled;
- in connection with access the division of responsibilities takes place along the principle of knowledge necessary and enough for storage, processing and transfer, the circle of those with the right of access is reviewed on a regular basis ;
- the IT system storing and processing the personal data has an appropriate network border protection and segmentation, and also the protection of network communication (https) is ensured;
- the regular saving and the storage of savings of the database storing and processing the personal data is controlled and is in compliance with the best practices of the industry;
- the business continuity planning (BCP) of the IT systems storing and processing the personal data is ensured, and in the case of a disaster the disaster recovery plans (DRP-s) are ensured, they are tested and controlled on a regular basis;
- each activity in connection with the control and processing of personal data is completely recorded, and it is ensured that such records are kept confidential, are available and are intact;
- the IT system is protected against malicious codes, the protection is up-to-date and is updated regularly;
- the identification, authentication and password management of the user having an access to the personal data is restricted and controlled, in view of the best practices in the industry;

### IV.3.

The Data Controller controls personal data in connection with the clients concluding a contract relationship with the Data Controller based on several legal provisions.

1. On the one hand the purpose of data controlling is the data controlling, customer due diligence and reporting obligation set out in Act LIII of 2017, and thereby the screening of unusual transaction patterns, which target the laundering of money through the Company obtained from criminal activities or the financing of terrorism.

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- Furthermore, pursuant to Act CXXXVIII of 2007 the Data Controller must store data which are necessary for judging whether the funds and services provided and offered by the Data Controller are appropriate for the client.
- Furthermore, the Data Controller shall also store the data concerning the client's tax domicile.

Purpose of data processing	Record of the client and transaction data
Legal basis of data processing	Act LIII of 2017 § 7-14.; Act CXXXVIII. of 2007 § 45., 55-60. §, § 123/B. and § 123/D.
Categories of data subjects	Natural persons in a client relationship with eBrókerház Zrt.  Family and surname, birth name, citizenship, place and date of birth, mother's maiden name, permanent home address (in the absence of a permanent home address, temporary place of residence), telephone, fax, e-mail, type of ID document, ID document number, tax domicile, tax identification number, US tax domicile, signature, telephone number, electronic mailing address (e-mail address), qualifications, type of employment, profession, origin of assets, yearly income, net worth, expected amount of investment, the origin of the amount to be invested, purpose of business relationship, declaration about the person of the actual owner, declaration about the politically exposed status of the person, answers given to the compliance test and conclusions drawn from such answers, in the case of clients acting through an authorizee the effective power of attorney, data concerning the client's contracts, orders, financial instruments and funds; telephone calls and electronic correspondences with the client – in connection with taking, transferring and performing the client's orders.
Categories of personal data	NTCA (National Tax and Customs Administration) Central Management Anti-Money Laundering Information Office
Categories of recipients	No
Data transfer to third countries	In the case of data processed based on Act LIII of 2017 § 7-14.; Act CXXXVIII. of 2007 § 123/B. and § 123/D. eight years following the termination of the contact with the client; In the case of data processed in connection with Act CXXXVIII of 2007 § 45. until the termination of contact with the client. In the case of data processed pursuant to Act CXXXVIII of 2007 § 55-60. at least eight years, in the case of telephone calls 5 years;
Envisaged time limit for erasure	

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Technical and organizational measures	<ul style="list-style-type: none"><li>- the access to the IT system storing and processing the data is restricted and controlled</li><li>- in connection with access the division of responsibilities takes place along the principle of knowledge necessary and enough for storage, processing and transfer, the circle of those with the right of access is reviewed on a regular basis ;</li><li>- the IT system storing and processing the personal data has an appropriate network border protection and segmentation, and also the protection of network communication (https) is ensured;</li><li>- the regular saving and the storage of savings of the database storing and processing the personal data is controlled and is in compliance with the best practices of the industry;</li><li>- the business continuity planning (BCP) of the IT systems storing and processing the personal data is ensured, and in the case of a disaster the disaster recovery plans (DRP-s) are ensured, they are tested and controlled on a regular basis;</li><li>- each activity in connection with the control and processing of personal data is completely recorded, and it is ensured that such records are kept confidential, are available and are intact;</li><li>- the IT system is protected against malicious codes, the protection is up-to-date and is updated regularly;</li><li>- the identification, authentication and password management of the user having an access to the personal data is restricted and controlled, in view of the best practices in the industry;</li></ul>
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#### IV.4.

In order to make sure that the payments made (by transfer, cash payment or online payment) to the client accounts kept with the Data Controller by the clients and third persons are booked to the right client account, the Data Controller needs to control the data set out in the chart above.

Purpose of data processing	Controlling the data concerning the payments made to the client's account
Legal basis of data processing	In the case of data processed pursuant to Act CXXXVIII of 2007 § 55-60.
Categories of data subjects	Natural persons depositing financial instruments to the client accounts kept with eBrókerház Zrt.

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Categories of personal data	<ul style="list-style-type: none"><li>- in the case of making a payment from a bank account: name of the bank account owner, bank account number, comment</li><li>- in the case of a payment made by a bank card: name of the card owner, last four digits of the card number, date of expiry;</li></ul>
Categories of recipients	Powercash21 Ltd.; Safecharge International Ltd.; Wirecard Bank AG
Data transfer to third countries	No
Envisaged time limit for erasure	Based on Act C of 2000 § 169. at least 8 years
Technical and organizational measures	<ul style="list-style-type: none"><li>- the access to the IT system storing and processing the data is restricted and controlled;</li><li>- in connection with access the division of responsibilities takes place along the principle of knowledge necessary and enough for storage, processing and transfer, the circle of those with the right of access is reviewed on a regular basis ;</li><li>- the IT system storing and processing the personal data has an appropriate network border protection and segmentation, and also the protection of network communication (https) is ensured;</li><li>- the regular saving and the storage of savings of the database storing and processing the personal data is controlled and is in compliance with the best practices of the industry;</li><li>- the business continuity planning (BCP) of the IT systems storing and processing the personal data is ensured, and in the case of a disaster the disaster recovery plans (DRP-s) are ensured, they are tested and controlled on a regular basis;</li><li>- each activity in connection with the control and processing of personal data is completely recorded, and it is ensured that such records are kept confidential, are available and are intact;</li><li>- the IT system is protected against malicious codes, the protection is up-to-date and is updated regularly;</li><li>- the identification, authentication and password management of the user having an access to the personal</li></ul>

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data is restricted and controlled, in view of the best practices in the industry;

IV.5.

In order to be fully compliant with the provisions of Act CXXXVIII of 2007 on complaint management and the provisions of the MNB decree, the Data Controller shall control the data specified in the MNB decree for the period set out therein.

Purpose of data processing	Control of data in connection with complaint management
Legal basis of data processing	Act CXXXVIII of 2007 § 121.; 435/2016 (16 December) Gov. decree; 28/2014 (23 July) MNB (Hungarian National Bank) decree; consent of the data subject
Categories of data subjects	The natural person filing a complaint (Complainant) concerning the behaviour, activities or non-compliance of eBrókerház Zrt. name; contract number, client number; home address, postal address; telephone number; means of communication; product or service affected by the complaint; description and cause of the complaint; request of the Complainant; the copy of documents held by the Complainant which are necessary for supporting the complaint, and which are not held by eBrókerház Zrt.; in the case of a client acting through an authorizee an effective power of attorney; any other data necessary for the investigation and answering of the complaint; in the case of a verbal complaint made via telephone the sound recording made of the communication
Categories of personal data	
Categories of recipients	No
Data transfer to third countries	No
Envisaged time limit for erasure	Based on Act CXXXVIII of 2007 § 121.; maximum 5 years - the access to the IT system storing and processing the data is restricted and controlled;- in connection with access the division of responsibilities takes place along the principle of knowledge necessary and enough for storage, processing and transfer, the circle of those with the right of access is reviewed on a regular basis ; - the IT system storing and processing the personal data has an appropriate network border protection and
Technical and organizational measures	

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segmentation, and also the protection of network communication (https) is ensured;

- the regular saving and the storage of savings of the database storing and processing the personal data is controlled and is in compliance with the best practices of the branch;

- the business continuity planning (BCP) of the IT systems storing and processing the personal data is ensured, and in the case of a disaster the disaster recovery plans (DRP-s) are ensured, they are tested and controlled on a regular basis;

- each activity in connection with the control and processing of personal data is completely recorded, and it is ensured that such records are kept confidential, are available and are intact;

- the IT system is protected against malicious codes, the protection is up-to-date and is updated regularly;

- the identification, authentication and password management of the user having an access to the personal data is restricted and controlled, in view of the best practices in the industry;

### V. Cookies

#### What are cookies?

Cookies are used by nearly all websites. They are small text files placed on your device when you visit or using the Data Controller's website (for the purpose of this cookies notice Website shall also mean trading platform and mobile app provided by the Data Controller) which enable the Data Controller's systems to recognize your device and help the Data Controller to provide you with better, faster, safer and customized experience, including for advertising and marketing purposes.

The Data Controller use cookies to analyze traffic on the Website, to track your activity and to help ensure you get the smoothest possible experience when visiting the Website. The information collected using cookies enable the Data Controller to ensure it present you with options tailored to your preferences on your next visit and to enhance the experience of the Data Controller's services on the Website.

Cookies do not harm your device, they are not computer programs, can't be executed as code and cannot be used to disseminate viruses. They can only contain and transfer as much information as the users themselves have disclosed to a website.

By using our website, you agree that the Data Controller can place the following types of cookies on your device. Should you wish to check, change, block or delete some and/or all of the cookies this can be managed and controlled within your browser settings. For more information on how to do this please read below the "How to control your cookies".

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### Types of cookies the Data Controller uses

#### Session cookies

Session cookies last only for the duration of your visit and are deleted when you close your browser. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer. They facilitate tasks such as allowing a website to identify that a user of a particular device is navigating from one page to another, supporting website security or basic functionalities.

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### Persistent cookies

Persistent cookies last after you have closed your browser, and allow the Data Controller to remember your actions and preferences and help the Data Controller to understand how you arrive and use the Website so the Data Controller can better improve its services. They can be used to provide information about numbers of visitors, the average time spent on a particular page and generally the performance of the website. Sometimes persistent cookies are used to provide targeted advertising based on the browsing history of the device.

### First and third party cookies

First party cookies are those set by or on behalf of the website visited. All other cookies are third party cookies. The Data Controller use both first party and third party cookies.

### Strictly necessary cookies

Cookies which are essential to enable you to use the Website and use its features, and for ensuring the security of the Data Controller's services. Without these cookies the Data Controller's services can't be provided. These cookies do not gather information about you that could be used for marketing or remembering where you visited while browsing the internet.

### Performance cookies

Cookies which collect information about your use of the Website, for example which pages you visited most often. They don't collect information that identifies you, although they may collect the IP address of the device used to access the site. The information is anonymous and is used to improve the website's performance, the user's experience and for advertising optimization purposes.

### Functionality cookies

These cookies allow the Website to remember choices you make such as your user name, language or your region and provide enhanced features. They may also be used to provide services you request, such as watching a video and can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. The information collected is anonymized (i.e. does not contain information by which an individual can be identified) and does not track your browsing activity across other websites.

### Targeting cookies

Cookies which collect several pieces of information about your browsing habits. They are usually placed by advertising networks. They remember that you have visited a website and this information is shared with other organizations such as media publishers. These organizations do this in order to provide you with targeted adverts more relevant to you and your interests.

Cookie name	Description
__lc.visitor_id.nnnnnnnn	Third party, functionality persistent cookie. Allows to contact visitors while using the website and to recognize returning visitors to the website. For more information please visit <a href="https://www.livechatinc.com/privacy-policy/">https://www.livechatinc.com/privacy-policy/</a>



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Cookie name	Description
TS[HHHHHHHHH]	A session, first party cookie, serves for verification and authentication of users' requests.
__qca, mc	Persistent, third party cookies provided by Quantcast, used for targeting and traffic measurement purposes. For more information please visit <a href="https://www.quantcast.com/faq/quantcast-services/">https://www.quantcast.com/faq/quantcast-services/</a>
__utma, __utmb, __utmc, __utmv, __utmz, __px, __ga, __gid	Google analytics cookies, primarily used to track visits to any site which uses Google analytics. These cookie store information such as the number of visits made from your device and the duration; record custom variables for segmentation, explain how you have reached our website and measure website's traffic. These cookies do not contain any personal information other than the IP address of your device. For more information please visit Google at <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_hjIncludedInSample	Third party, session cookie, provided by Hotjar, used for testing operations funnels. For more information please visit <a href="https://www.hotjar.com/legal/policies/cookie-information">https://www.hotjar.com/legal/policies/cookie-information</a>
eft	A performance, first party persistent cookie, enabling to provide the website's users relevant content in accordance to their preferences.
Geoip	A session first party cookie, validating the country of the IP address in use. This cookie does not contain any personal information other than the IP address of users' device.
has_js	A performance, first party session cookie, validating whether users' browsers support JavaScripts.
hplang	A functionality, first party session cookie, enabling presenting the website in the user's preferred language.
Snap	Performance and functionality, third party persistent cookies, supporting the website's chat box capabilities. No personal information is collected apart from the users' email address, which are provided by the users themselves. For more information please visit <a href="https://help.snapengage.com/live-chat-cookies/">https://help.snapengage.com/live-chat-cookies/</a>
Social media	We use Facebook, LinkedIn, twitter and Snapchat remarketing services to advertise our content, products and services. For more information about these cookies and on how to manage them please visit:  Facebook at <a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a> LinkedIn at <a href="https://www.linkedin.com/legal/cookie-policy?trk=hp-cookies">https://www.linkedin.com/legal/cookie-policy?trk=hp-cookies</a> Twitter at <a href="https://help.twitter.com/en/rules-and-policies/twitter-cookies#">https://help.twitter.com/en/rules-and-policies/twitter-cookies#</a> Snapchat at <a href="https://www.snap.com/en-US/cookie-policy/">https://www.snap.com/en-US/cookie-policy/</a>
Google Adwords	We use the Google AdWords remarketing service to advertise our products and services on other websites to previous visitors to our website. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. The Cookies are valid for 30 days from creation. This is a third party cookie. For more information please visit Google's Ads Settings at <a href="https://adssettings.google.com/authenticated?hl=en">https://adssettings.google.com/authenticated?hl=en</a> .
logglytrackingssession	A functionality, third party session cookie, used for debugging and troubleshoot purposes. For more information please visit <a href="https://www.solarwinds.com/cookies">https://www.solarwinds.com/cookies</a> .

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## INFORMATION ON DATA PROCESSING

Cookie name	Description
VWO	A functionality third party cookie, used for website's performance measurement and optimization. For more information please visit <a href="https://vwo.com/knowledge/what-are-the-cookies-stored-by-vwo/">https://vwo.com/knowledge/what-are-the-cookies-stored-by-vwo/</a> .
emerp	First party cookies, persistent until being deleted by the user. Used for purposes of marketing tracking, synchronization and optimization. No personal information is collected apart for users' email address which being provided by the users themselves once they register to receive the Company's services and products.
aspxroles	A session, performance and functionality first party cookie, enables users to perform authorized functions.
Cs; B; db; version; MinDealGroupId; sd	Persistent, strictly necessary and performance first party cookies, enabling static content routing parameters to improve performance.
ASP.NET_SessionId	A strictly necessary, performance and functionality, session first party cookie, used for keeping users logged in while in session.
cdn	A performance, persistent first party cookie, enables to base URL for static content to improve performance.
db	A strictly necessary, persistent, first party cookie, allows to provide users with relevant texts and images.
FXnetWeb	A persistent, strictly necessary, functionality, first party cookie, creating authentication token to improve Functionality.
hideMultipleDealsCloseAlert	A persistent, functionality first party cookie, used for saving users preferences for improving services functionality.
IsCSMPush	A functionality, persistent first party cookie, for the purpose of testing operation to improve services functionality.
JWT-Authority	A persistent, functionality first party cookie, used for registration purposes from mobile devices.
Language, LID	A functionality, strictly necessary persistent first party cookies, used for saving users preferences to improve services functionality.
LoginReason	A persistent first party cookie, used for troubleshooting purposes.
NativeUnknownApp, NativeIosApp, NativeAndroidApp	Persistent, first party cookies, used for optimizing purposes of the trading platform over mobile devices.
RmData	A persistent, performance and functionality first party cookie, used as authentication token to improve Functionality and performance.
RememberMe	A persistent, performance and functionality first party cookie used for the maintenance of users preferences to improve functionality and performance.
UserDeviceInformation; ViewMode	Persistent, strictly necessary first party cookies, used for mobile UI support.
csmg	A strictly necessary, performance and functionality first party cookie used for keeping users logged in to the system.
FXNET_SessionId	A persistent, strictly necessary first party cookie, used as server session identifier for keeping users logged in.

Please note that:

- Some of the Data Controller's services will not function if your browser does not accept cookies.



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## INFORMATION ON DATA PROCESSING

- Where a cookie is a third party cookie please visit the providers' website for more information.
- Unless mentioned otherwise on the description column no personal information is collected.
- The above information is subject to changes from time to time.

### How to control your cookies

Most web browsers will accept cookies but if you would rather we didn't collect information in this way you can always choose to accept all or some, or reject cookies in your browser's settings. However, rejecting all cookies means that you may not be able to take full advantage of some or all of our website's features.

You can manage your cookies set by any website through the browser settings on each browser you use, on each device you use to access our website, and you can also allow cookies from specific websites only by making them "trusted websites" in your Internet browser.

Should you wish not to receive cookies that are not strictly necessary to perform basic features of our website, you may choose to opt-out by changing your browser settings. For more information generally on cookies, including how to disable them, please refer to <https://www.aboutcookies.org/>.

### VI. The rights of the data subject

Concerning their personal data controlled by the Data Controller the data subject shall have the right to

- a) access their personal data;
- b) have their personal data rectified;
- c) request the erasure of their personal data;
- d) request the restriction of processing of their personal data;
- e) object to the controlling of their personal data;
- f) receive their personal data and transfer them to another data controller, if the legal prerequisites are given (right to data portability);
- g) if the personal data are controlled on the basis of the consent of the data subject, the data subject may withdraw their consent at any time.

If the data subject wishes to exercise their aforementioned rights, they can send their request using the Data Controllers' contact details given below. The Data Controller provides information on the measures taken in connection with the request without undue delay, but usually within 30 days of receipt of the request. If the Data Controller does not take action, then it provides information on the reasons for not taking any action without undue delay, but usually within 30 days of receipt of the request. If the data subject does not agree with the Data Controller's answer or action taken, then there are options for a judicial remedy. The Data Controller informs each recipient about any rectification, erasure or limitation of data controlling, with whom or with which the personal data had been shared, except if this proves to be impossible or it would involve a disproportionate effort. The Data Controller gives information on the recipients if the data subject asks for it.

The Data Controller shall provide information and take action free of charge. Where requests from a data subject are manifestly unfounded or – in particular because of their repetitive character – excessive, the

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## INFORMATION ON DATA PROCESSING

Data Controller may, taking into account the administrative costs of providing the information or taking the action requested:

- may charge a reasonable fee, or
- may refuse to act on the request.

Where the controller has reasonable doubts concerning the identity of the natural person making the request, the Data Controller may request the provision of additional information necessary to confirm the identity of the data subject.

The data subject may send their request to the following contacts:

- in e-mail to [dataprotection@iforex.hu](mailto:dataprotection@iforex.hu),
- in fax to +36-1-880-8440,
- via post to 1054 Budapest, Szabadság tér 14.,
- or they may also propose their request via telephone, at +36-1-880-8400.

In case the data subject's request is rejected by the Data Controller, then the data subject shall be entitled to file a complaint against the request at the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; telephone: +36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or they may turn to the competent court based on their address of residence or whereabouts.

### VI.1. Right of access

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 circumstances of such processing. The information requested may, among others, include the following: the purposes of data processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed by the Service Provider; the envisaged period for which the personal data will be stored; and where the personal data are not collected from the data subject, any available information as to their source.

### VI.2. 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, and to request the completion of any incomplete data about him or her.



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## INFORMATION ON DATA PROCESSING

### VI.3. 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, where one of the following grounds applies:

- a. the personal data are no longer needed;
- b. the consent on which the processing is based is withdrawn, and 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 by the Data Controller;
- e. the personal data have to be erased for compliance with a legal obligation.

The Data Controller will not erase the data concerned if the data controlling is necessary, due to one of the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing of the personal data;
- for the establishment, exercise or defence of legal claims.

### VI.4. Right to restriction of data 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;
- d. the data subject has objected to processing; in this case the restriction applies during the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, 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. Before the restriction of processing is lifted, the Data Controller informs the data subject of such.

## INFORMATION ON DATA PROCESSING

### VI.5. Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the Data Controller's legitimate interests for the processing. In such a case the Data Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

### VI.6. Right to data portability

If this does not violate the rights and freedoms of others, the data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and furthermore have the right to have those data transmitted directly by the Data Controller to another controller where:

- a. the processing is based on consent of the Data Subject or it 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;
- b. the processing is carried out by automated means, that is, the personal data are processed in an IT system and not on paper.