DATA PROTECTION NOTICE
of
CHEF MARKET FOOD WHOLESALE TRADING
PRIVATE LIMITED COMPANY

1. **Introduction**

The purpose of this present policy is to lay down data protection and data management rules applied by

Chef Market Food Wholesale Trading Private Limited Company
Registered office: H- 2161 Csomád; 73 József Attila utca
Telephone: 06 1 919 9999
E-mail: adatkezeles@chefmarket.hu
Website: www.chefmarket.hu
Registration number: 13-10-041674

hereinafter: **Controller,**

and to provide relevant information on the processing and protection of their personal data to suppliers, customers and other business partners concerned, visitors of the www.chefmarket.hu website, participants of the loyalty schemes and customers of the webshop.

The Controller shall organize and implement data management operations with a view to ensure the highest level of protection for the privacy of data subjects. The Controller shall protect the personal data in particular against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as against accidental destruction or damage, data corruption or accidental loss and inaccessibility resulting from the changes in technology used.

When formulating the present rules the Controller took into special consideration
- ✓ the Fundamental Law of Hungary;
- ✓ Act CVIII of 2001 on certain issues of electronic commerce services and information society services;
- ✓ Act CXII of 2011 on information self-determination and freedom of information (Infoact.);
- ✓ Law V of 2013 on the Civil Code (Civil Code);
- ✓ Act VI of 1998 on publication of the Convention for the protection of individuals with regard to automatic processing of personal data done in Strasbourg on 28th January 1981;
- ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR regulation).

2. **Definitions and terms used in the Notice**

Data processing**:** any technical operation performed relating to data management;

Data management: any operation or set of operations performed on personal data irrespective of the means, such as, in particular, collecting, registering, recording, classifying, storing, altering, using, querying, transferring, disclosing, aligning or combining, blocking, erasing and destroying, as well as preventing their further use, taking photographs, making audio or visual recordings;

Controller: the natural or legal person, or an organization with legal personality, who alone or jointly with others determines the purposes of the processing of data, makes decisions on the processing of data (including the means of use) and implements or have them implemented by the data processor;

Restriction of processing: the marking of stored personal data with the aim of limiting their processing in the future;

Transfer of personal data: making available the personal data to a determined third party;

Data erasure: making the data unrecognisable so that they will be irretrievably lost;

Privacy incident: a security breach resulting accidental or unlawful destruction, loss, alteration or unauthorised disclosure of, or access to the data transferred, stored or processed by other means;

Data subject: the natural person whose personal data are concerned by the processing of data;

Third party: a natural or legal person, or any organization other than the data subject, the controller, the data processor or the persons authorised to manage personal data under direct control of the controller or the data processor;

Consent: freely given, specific and informed consent of the data subject that gives explicit agreement to the processing of their personal data – fully or only extending to certain operations.

Joint controllers: Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.

Filing system: any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

Personal data: any information relating to an identified natural person – in particular his or her name, identification number, also one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of the natural person -, as well as any conclusion on the person that is made on the basis of the data and does not constitute information of public interest or publicly available information on grounds of public interest. Name, address and e-mail address, among others, constitute personal data;

Objection: the data subject's declaration in which he or she objects to the processing of their personal data and requests further processing to be ceased and the data erased;

3. **Principles relating to processing of personal data**

Data management carried out by Controller complies with the GDPR data processing principles, which are as follows:

Principles of lawfulness, fairness and transparency: Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the subject matter.

Purpose limitation principle: Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Data minimisation principle: Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Acccuracy principle: 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.

Storage limitation principle: 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.

Integrity and confidentiality principle: 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.

Accountability principle: The controller shall be responsible for, and be able to demonstrate compliance with principles.

Besides principles relating to processing of personal data, the common requirement for providing adequate information is laid down, since the Controller shall provide information to data subjects on data processing performed on any legal basis.

4. Scope of personal data processed

4.1. Contact through website
Data subjects can contact the Controller through its websites, which are the following:
www.chefmarket.hu
www.chefclub.chefmarket.hu

Scope of personal data processed	name and e-mail address of the data subject
Purpose of data processing	contact between data subject and Controller
Legal basis of data processing	freely given consent of the data subject
Duration of data processing	until the data subject requests the data to be erased

4.2. Cookies
A cookie is a small text file stored until its set expiration on the hard disk of the data subject's computer or mobile device which is activated again when the user revisits the site. The purpose of cookies is to store information and personal settings, but the data hold by them can not be related to the visitor's identity. Cookies help to create a user friendly website and improve the online experience of the data subject. If the data subject does not accept the Controller's use of cookies certain functionality of the site may become unavailable while he or she is browsing.

Scope of personal data processed	the Controller stores all analytical information without name or other personal data
Purpose of data processing	storing the personal settings of the data subject
Legal basis of data processing	freely given consent of the data subject

Duration of data processing	the data subject can erase the cookies stored on his or her computer or mobile device by the browser settings any time

4.3. Facebook

The Controller manages the Chef Market Zrt. Facebook page.

The data subject can follow the news feed posted on the timeline by clicking the "like"or "tetszik" button on the pages.

Scope of personal data processed	name of the data subject
Purpose of data processing	news and current information relating to the Controller
Legal basis of data processing	freely given consent of the data subject
Duration of data processing	The data subject can unfollow the Controller's Facebook page by clicking the „dislike" or "nem tetszik" button, or delete unwanted news posted on the timeline by setting news feed preferences.

4.4. Job advertisements

The Controller does not advertise jobs anonymously and deletes unsolicited applications without delay unless they require further handling. Where an applicant is recruited, they are asked for consent to the processing of their data.

Applications for the advertised jobs are considered by the Controller in the cases where the data subject gave consent to it in his or her CV.

Scope of personal data processed	name, telephone, e-mail and address of the data subject, the languages spoken and freely given personal data stated in his or her CV
Purpose of data processing	contact between the data subject and the Controller, establishment of an employment relationship
Legal basis of data processing	freely given consent of the data subject
Duration of data processing	unless they require further handling data are deleted without delay

4.5. Contracting with partners

Where the Controller and his partner enter a contractual relationship the parties indicate individuals as contact persons and their contact details.

Scope of personal data processed	name, phone number, position and e-mail address of the data subject
Purpose of data processing	contacts between undertakings, performing the contract
Legal basis of data	data processing is required to perform contractual obligation

processing	
Duration of data processing	until the termination of the contractual relationship or for a duration defined in accordance with the provisions of the relevant legislation

4.6. <u>Screening potential suppliers</u>
When contracting with a supplier the Controller shall screen the company and its executive officer in compliance with the due diligence protocol required by the tax authority. In doing so, the Controller shall copy the personal documents handed over by the executive officer so that it can prove in the course of possible future tax authority inspections that it acted with due diligence before entering into contract with the supplier.

Scope of personal data processed	name, date of birth, address, email address, telephone, az érintett neve, születési neve, lakcíme, e-mail címe, telefonszáma, lakóhely/ place of habitual residence, mother's name, place and date of birth, anyja neve, születési helye, -ideje, serial number of identity documents
Purpose of data processing	contacts between undertakings, performing the contract, compliance with the due diligence protocol required by the tax authority, partner screening
Legal basis of data processing	data processing is required to perform contractual obligation
Duration of data processing	until the termination of the contractual relationship or for a duration defined in accordance with the provisions of the relevant legislation

4.7. <u>Participation in Chef Club loyalty program</u>
Data subjects, namely the customers of the Controller, earn loyalty points that they can convert into rewards – free products and services.

Scope of personal data processed	name, address, position, phone, e-mail address of the data subject
Purpose of data processing	participation in Chef Club loyalty program
Legal basis of data processing	freely given consent of the data subject
Duration of data processing	unless they require further handling data are deleted without delay

4.8. <u>Buying through Chef Konyha webshop</u>

Scope of personal data processed	name, address, position, phone, e-mail address of the data subject
Purpose of data processing	registration – creating a user account is required to use the a webshop invoicing – ensuring compliance with the relevant legislation

	complaints handling – handling of consumers'complaints
Legal basis of data processing	registration – freely given consent of the data subject invoicing – ensuring compliance with the relevant legislation complaints handling – complaints handling obligation of the webshop operator in accordance with the provisions of the Consumer Protection Act
Duration of data processing	registration – ends when erasure is requested invoicing – as determined in the Accounting Act, currently 8 years complaints handling – determined in the Consumer Protection Act in 5 years

5. **Data processor**

   The following data processors can get access as necessary to certain groups of personal data bearing in mind the relating principles of data processing.

Name of data processor	Contact details	Duties
Bácskai, Boglárka sole proprietor	3100 Salgótarján, Kaszinó sor 2. 3 em. 15 ajtó	Accounting
Ballner, Anikó s.p.	1037 Budapest, Domoszló útja 46/C.	Translation
Ballner, Péter s.p.	1112 Budapest Bod Péter utca 21. B ép.	Marketing
Balogh, Renáta s.p.	1147 Budapest Kerékgyártó utca 47-49. A ép.3 em. 32.	Marketing
Boros, Gábor s.p.	2463 Tordas, Petőfi út 35.	Sales
Csapka, Klára s.p.	1048 Budapest, Óceán-Árok utca 7. 10 em. 40 ajtó	Purchaser
Csató, Vanda Rózsa s.p.	3350 Kál Kálitag tanya 5.	HR duties
Holló, Katalin s.p.	1147 Budapest Öv utca 133. 5 em. 13 ajtó	Sales
Hozleiter, Mónika s.p.	1173 Budapest, Pesti út 166. 5 em. 34 ajtó	Petty cash handling
Kiss, Imre s.p.	1044 Budapest Szondi utca 52.	Transport operator
Láng, Éva Szilvia s.p.	1108 Budapest Lenfonó utca 8. FS em. 1A ajtó	Purchaser
Paróczi, Krisztina s.p.	7936 Szentlászló Zrínyi utca 17.	Purchaser
Pelyák, Tibor s.p.	1043 Budapest Munkásotthon utca 43. 5 em. 20 ajtó	Transport operator
Sarkadi, Miklós s.p.	2092 Budakeszi József Attila utca 133.	Financial controller
Szilágyi, Tibor s.p.	1158 Budapest Nyírpalota utca 77. 6 em. 29 ajtó	Purchaser
ANDOCSEK Informatika Private Limited Company	1024 Budapest, Buday L utca 12.	IT services
Gömb Stúdió DTP Limited Liability Company	2151 Fót, Sarló utca 8.	IT services

6. **Joint data processing**

   In the context of its food wholesale operation the Contoller uses subcontractor to perform the duties of warehousing and logistics. Within the framework of joint data processing the

subcontractor also complies with the principles set out in this present Notice and the relevant provisions of the law.

Joint data processor	Contact details	Feladatok
Chef Market Logisztika Limited Liability Company	1158 Budapest, Késmárk utca 9.	Warehouse and logistics duties

7. **Data transfer, data processing**

The Company shall not transfer by any means the personal data in the possession of the Controller to a third party without the prior consent of the User, except in cases when the Company is obliged by legal provisions to do so.

8. **Data security**

The fundamental forum that records data is sERPa corporate governance system.

The Controller stores the above listed personal data at the registered office of the Company, or with a view to joint data processing, the joint data processor stores the data.

The Controller commits to ensure data security in accordance with the provisions of the GDPR.

In the course of operating the information systems the necessary authorisation, internal organisational and technical solutions ensure that personal data may not fall into hands of unauthorised persons and unauthorised persons can not erase, save or modify the data. The Controller shall ensure that the data processors also comply with the requirements of data security.

The Controller shall keep records of possible privacy incidents and notifies the data subject and the National Authority for Data Protection and Freedom of Information (NAIH) of the incident if necessary.

Such persons can get access to the personal data – employees and contracted parties in particular, acting in the Controller's interest – to whom access is necessary in order to perform their duties, and who are aware of and acquainted with the obligations concerning the data processing.

The Controller shall take every necessary measure to ensure safe data processing, to prevent data corruption and to implement and operate appropriate data processing systems needed to the above. The Controller shall make sure that unauthorised persons will not access, disclose, transmit, modify or erase the data.

The Controller commits to ensure data security by using state-of-the-art and most suitable equipment and security policy, in particular with a view to ensuring that unauthorised persons will not access the data, and to preventing any unlawful disclosure, erasure or destruction of the data. The Controller shall make every effort to prevent accidental damage or loss of the data and will also impose the above obligation on his employees who are involved in data processing activities.

The Controller shall under no circumstances collect special data, that is to say, data concerning racial origin, belonging to a national or ethnic minority, political views or party affiliation,

religious or other philosophical belief, membership in interest representative organisations, health state, pathological dependence, sexual life or criminal record.

9. Rights of the data subject in the course of data processing

Right to be informed
The Controller shall provide easily accessible (online or offline) information on the relevant aspects of data management in plain and comprehensible language by appropriate means. When the Controller collects personal data fom the data subject, or if he or she asks for information later, then at the time of giving the requested information the Data Protection Notice shall be made available to the data subject and the Controller shall have a declaration of consent signed, which verifies that the data subject was made aware of, understood and accepted the content of the Data Protection Notice.

The data subject is entitled to ask for information at any time concerning his or her personal data processed by the Controller. Enquiries about respective data processing can be made to the e-mail address or postal address given in the Data Protection Notice, or also by phone. The Controller is obliged to provide the requested information within 30 days on receipt of a request

Right to erasure
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 concerning the data subject without undue delay. Where the Controller gave third parties access to the data requested to be erased, he shall be obliged to inform all the parties, to whom the data concerned were disclosed, to erase all references or personal data stored by them. This aims – unless there is a legal or reasonable barrier to it – to make the data concerned "disappear" from all existing databases
The obligation to erase shall not apply where data processing is
- ✓ necessary for the purpose of exercising the freedom of expression or the right to information;
- ✓ necessary for establishment, exercise or defence of legal claims;
- ✓ necessary for compliance with legal obligations;
- ✓ necessary for archiving purposes in the public interest, for scientific or historical research purposes or statistical purposes, or where erasure would render impossible or seriously jeopardize the fulfilment of the data processing purposes.

Furthermore, the Controller shall erase the personal data in his documentation relating to the data subject if the purposes of processing have ceased.

It shall be ensured that a record of the destruction of paper-based documentation is drawn up in order to prove subsequently to the competent authority that it was done.

Rectification
The data subject has the right to claim that the personal data concerning him or her are inaccurate and request the correct data to be indicated instead. The Controller bears responsibility for the accuracy of the personal data, and shall ensure that their accuracy is checked from time to time.

Right to restriction of processing:
The data subject shall have the right to obtain from the Controller restriction of processing, for instance, in case of an unsettled legal dispute. When processing is restricted the respective

personal data can only be processed, except for storage, with the consent of the data subject, or for establishment, exercise or defence of legal claims, or in order to defend the rights of other natural or legal persons, or on grounds of public interest of the EU or a member state.

Right to data portability:
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 (e.g. doc, pdf etc.) and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. It enables the data subject to exercise the right to have his or her personal data transmitted directly from one controller to another

Right to objection
The data subject shall have the right to object to the processing of personal data relating to him or her for specific reasons at any time where he or she has not given consent to processing data.

If the data subject intends to assert his or her rights it implies identification and necessarily communication with the Controller, which requires giving personal data (but identification is based only on data that are already processed), and your complaint concerning the data processing is accessible in our e-mail account for the duration set out regarding complaints in this present notice.

Complaints are responded without delay, but no later than 30 days.

The data subject can assert his or her above indicated rights through electronic mail sent to **adatkezeles@chefmarket.hu** e-mail address of the Controller, or through a declaration addressed to the Controller and sent to the Controller's registered office by post.

10. **Data Protection Officer**
The Data Protection Officer shall provide professional counselling to the Company, control activities relating to data processing and facilitate the Controller's operation by liaising with competent authorities and handling communication with the data subjects.

Name: Richárd. Andrejszki JD
Telephone: 06 1 919 9999,
E-mail: adatkezeles@chefmaket.hu

11. **Judicial remedies**
The data subject is entitled to appeal to the National Authority for Data Protection and Freedom of Information (NAIH; registered office: H-1125 Budapest, 22/C Szilágyi Erzsébet fasor; www.naih.hu, Telephone: +36 (1) 391-1400, Telefax: +36 (1) 391-1410, E-mail: ugyfelszolgalat@naih.hu) or to assert his rights concerning the processing of personal data before a court of competent jurisdiction according to the Law CXXX of 2016 on the Civil Code.

12. **Final provisions**
If, however, we intend to perform further processing relating to the collected data with purposes other than those determined when the collection was carried out, we inform the data subject prior to further data processing on its purposes.

Data processing may commence only subsequently and where consent is the legal basis for processing, in addition to information provision, your consent is also required to data processing.

The Controller reserves the right to modify this present Notice or to amend it in accordance with changes in EU or Hungarian legislation

This Notice shall be effective as of 25th July, 2018.

Chef Market Food Wholesale Trading
Private Limited Company
Richárd Andrejszki, JD Managing Director