

GDPR Data Protection Compliance Agreement

Hammer MS Kft, Budapest Hungary is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, Hammer MS Kft, Hungary, Budapest is committed to the appropriate protection and use of personal information (sometimes referred to as "personally identifiable information" or "PII") that has been collected online.

Please review this privacy statement ("Privacy Statement") to learn more about how we collect, use and protect the personal information that we have obtained.

1. Collection and use of personal information

1.1. Who processes your personal data?

Hammer MS Kft, Budapest, Hungary (1037 Budapest, Farkastorki út 18., cgjsz: 01-09-565282) responsible for the processing of personal data.

1.2. What are the purposes of processing your personal data?

We are able to identify the following known purposes of the processing of data:

- recruitment;
- registration for a specific event or publication;
- subscription of selected materials;
- registration for a dedicated event, programme, application, contest or campaign;
- submission of a request for proposal;
- ordering marketing information;
- submission of a contract request;
- use of applications or online tools.

In these instances, data are always submitted voluntarily.

1.3. What are the grounds to process your personal data?

Depending on the purpose of the processing of your data, Hammer MS Kft, Hungary has proper legal grounds for processing of your data, including for instance:

- when the processing is necessary to perform the agreement concluded with you or to take steps required by you before concluding the agreement – point (b) of Article 6(1) of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (GDPR);

- when you are asked to grant your consent to the processing of personal data for the specific purpose – point (a) of Article 6(1) of the GDPR;
- when we pursue our so-called legitimate interests, e.g. are accepting and answering your inquiry – point (f) of Article 6(1) of the GDPR;
- processing is necessary for compliance with a legal obligation to which we are subject, e.g. we are required to make available personal data to state authorities – point (c) of Article 6(1) of the GDPR.

1.4. Are your “sensitive” personal data processed?

Hammer MS Kft does not intentionally collect “sensitive” personal data, unless such a duty arises from applicable legal regulations, e.g. for the purposes of recruitment. Sensitive information includes personal data revealing racial or ethnic origin, political opinions, trade union membership, religious or philosophical beliefs, data concerning health or data concerning a user's sex life, sexual orientation, criminal record, as well as genetic and biometric data.

We request the users to carefully consider the disclosure of sensitive information to Hammer MS Kft and not to provide sensitive information to Hammer MS Kft, unless they grant their explicit consent to using this information by Hammer MS Kft for the purposes of lawful activities of Hammer MS Kft and storing such data in databases of Hammer MS Kft. If you have any questions pertaining to whether the disclosure of sensitive information to Hammer MS Kft is or can be required in the particular case, please contact use at info@hammeragency.hu.

2. Automatic collection of personal information

In some instances, Hammer MS Kft and its service providers uses cookies, web beacons and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability and effectiveness of Hammer MS Kft's online presence, and to measure the effectiveness of our marketing activities.

Information collected in such a way no always constitutes personal data, i.e. it does not enable us to identify the particular user, but it may happen that connecting an IP address or location information to the specific e-mail of the user will be possible.

2.1. IP addresses

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate will be recorded for IT security and system diagnostic purposes. This information will also typically be used in aggregate form to conduct web site trend and performance analysis.

2.2. Cookies

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On some of our web sites, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still

be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our web sites' features.

Other third party tools and widgets may be used on our individual web pages to provide additional functionality. Use of these tools or widgets may place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.

BY NAVIGATING ON OUR WEB SITES OR ENTERING YOUR LOGIN DETAILS TO ACCESS AREAS RESERVED FOR REGISTERED USERS, YOU AGREE THAT WE CAN PLACE THESE COOKIES ON YOUR COMPUTER OR INTERNET ENABLED DEVICE.

2.3. Google Analytics

Hammer MS Kft uses Google Analytics. More information about how Google Analytics is used by Hammer MS Kft can be found here: <http://www.google.com/analytics/learn/privacy.html>

To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the [Google Analytics Opt-out Browser Add-on](#). The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services.

2.4. Adobe Analytics

Hammer MS Kft uses Adobe Analytics tools. More information on using Adobe Analytics tools by Hammer MS Kft is available at: <https://www.adobe.com/pl/privacy.html>

2.5. Web beacons

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. Hammer MS Kft only uses web beacons in accordance with applicable laws.

Hammer MS Kft or its service providers will use web beacons to track the effectiveness of third party web sites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded.

In some of our newsletters and other communications, we will monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

2.6. Location-based tools

Hammer MS Kft will collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

3. Social media widgets and applications

Hammer MS Kft web sites will typically include functionality to enable sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications will collect and use information regarding your use of Hammer MS Kft web sites (see details on 'Social Sharing' cookies above). Any personal information that you provide via such social media applications will often be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, Hammer MS Kft web sites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal data provided by users using any Hammer MS Kft social media features can be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we often have limited or no control.

4. Children

Hammer MS Kft understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 16. It is our policy never to knowingly collect or maintain information about anyone under the age of 16, except as part of an engagement to provide professional services.

5. Sharing and authorizing processing of PII

Hammer MS Kft does not disclose personal data to unrelated entities, except for situations, when it is necessary in relation to our activities or for the purposes of the implementation of requests of the website users, or in situations required or permitted by legal regulations.

In certain instances, Hammer Ms Kft may disclose information about the users to employees or collaborators of Hammer MS Kft or – by entrusting their processing – may disclose them to external firms, providers of services or sellers operating on our behalf in order to fulfil requests of the users.

Additionally, Hammer MS Kft can entrust the processing of personal data to entities in third countries, and can send these data to associated HMS Network PL, SK, CZ and Streamline GmbH firms or external entities cooperating with Hammer MS Kft or operating on our behalf. Hammer MS Kft can also store personal data in locations subject to a jurisdiction other than of the place of stay or registered office of the particular user. However, data can be transferred to a third country only when (subject to other generally binding legal regulations), conditions guaranteeing the required degree of protection of natural persons set in the GDPR are met, e.g. an agreement containing standard contractual clauses requiring certain degree of protection of personal data was concluded with the entity that receives the data.

Hammer MS Kft can make available personal data in relation to sale, assignment or any other transfer of the title to the website, and resulting disposal/transfer of rights to the website, to which the data in question are related, as well as at the request of authorities or law enforcement agencies, or when required by applicable laws, court judgement or other state regulations. The need to disclose personal data can result from audits of data privacy or security and/or when examining complaints or implementing security-related activities. Hammer MS Kft does not sell personal data to third parties that could use this information for marketing purposes.

6. Choices

In general, you are not required to submit any personal information to Hammer MS Kft, but we will require you to provide certain personal information in order for you to receive additional information about our services and events. Hammer MS Kft will also ask for your permission for certain uses of your personal information, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your information promptly, although we may require additional information before we can process your request.

As described in "Cookies" above, if you wish to prevent cookies from tracking you as you navigate our sites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our sites may not work properly if you elect to refuse cookies.

7. Access to data and rights

In a majority of instances, if a user provides us with personal data, he/she has relevant access thereto, which enables him/her to modify these data and correct any errors in these data. The user can also send a request for updating or erasing certain data to support@hammeragency.eu, as a result of which, Hammer MS Kft will take relevant steps aimed at fulfilling this request, provided it is consistent with applicable legal regulations.

The user should remember about his/her rights in relation to the processing of his/her personal data, referred to in the GDPR, i.e.:

- **right of access to his/her own personal data** (including obtaining the confirmation whether these data are processed or information about, e.g. purposes, sources, categories of data processed and their storage periods), which also includes the right to receive free copies of own data (for subsequent copies required by the data subject we may charge a reasonable fee taking into account the administrative costs);
- **right to rectification** (when data are inaccurate), which also includes the right to have incomplete personal data completed, but to this end, you may be required to provide a supplementary statement;
- **right to erasure** (so-called “right to be forgotten), when, e.g. the personal data are no longer necessary in relation to the purposes for which they were collected, consent to the processing was withdrawn or there are no other grounds for the processing of these data;
- **right to restriction of processing**, when e.g. you contest the accuracy of the personal data – for a period enabling us to verify the accuracy of these data;
- **right to object to processing of personal data**;
- **right to data portability**, including the right to receive from us the personal data concerning you, which you provided to us, in a structured, commonly used and machine-readable format;
- **right to withdraw your consent** to the processing of data (at the same time, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal);
- **right to lodge a complaint with the President of the Office for the Protection of Personal Data**, when you conclude that the processing of personal data breaches provisions of the GDPR.

8. Data security and integrity

Hammer MS Kft has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite Hammer MS Kft's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

Additionally, one of the rules of the Hammer MS Kft policy in this respect is storing personal information only for the period, during which:

- they are necessary to fulfil the user’s request;
- they are necessary to exercise the right or fulfil the duty arising from generally applicable legal regulations, policies, rules or other requirements binding in Companies of HMS Network; or
- until the user requests erasure of this information.

The period of personal data storage depends on the specific nature and circumstances (especially purpose) of collecting personal data of the user.

9. Links to other sites

Please be aware that Hammer MS Kft web sites will typically contain links to other sites, including sites maintained by other firms that are not governed by this Privacy Statement but by other privacy statements that will often differ somewhat. We encourage users to review the privacy policy of each Web site visited before disclosing any personal information.

10. Changes to this statement

Hammer MS Kft may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "updated" date at the top of this page. Any changes to the processing of personal data as described in this Privacy Statement affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

11. Policy questions and enforcement

Hammer MS Kft is committed to protecting the online privacy of your personal information. If you have questions or comments about our administration of your personal information, please contact us at info@hammeragency.hu. You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement.