

Privacy Notice on the processing of customer data

The purpose of this privacy notice (hereinafter referred to as the "**Notice**") is to set out the data protection, data processing and data management rules applicable to customers who approach the Data Controller (hereinafter referred to as the "**Customer**" or "**Customers**"), which the Data Controller undertakes to comply with and to which it accepts to be bound. In defining this Notice and in processing personal data, the Controller shall act in accordance with the provisions of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (hereinafter referred to as "GDPR"). The Prospectus and the data processing of the Data Controller shall be governed by Hungarian law.

1. Name and contact data of the data controller

Company name: **DIGIC PICTURES Filmgyártó, Szoftverfejlesztő és Kereskedelmi Korlátolt Felelősségű Társaság**

Registered office: 1031 Budapest, Záhony utca 7

Company registration number: Cg.01-09-693165

Tax number: 12573383-2-41

Represented by: Sándor RABB managing director

Website: www.digicpictures.com

E-mail: privacy@digicpicutres.com

Hereinafter as: "**DP**"

Company name: **DIGIC Services Korlátolt Felelősségű Társaság**

Registered office: 1031 Budapest, Záhony utca 7

Company registration number: Cg.01-09-303274

Tax number: 26125921-2-41

Represented by: Sándor RABB managing director

Website: www.digicpictures.com

E-mail: privacy@digicpicutres.com

Hereinafter as: "**DS**"

DP and DS are considered joint controllers and are hereinafter collectively referred to as "DIGIC".

1. THE SCOPE OF DATA SUBJECT DATA, THE PURPOSE, LEGAL BASIS, AND DURATION OF PROCESSING

	THE SCOPE OF THE DATA PROCESSED	PURPOSE OF PROCESSING	LEGAL BASIS FOR PROCESSING	DURATION OF DATA STORAGE
	Potential/existing Customer <ul style="list-style-type: none">• name• contact name• phone number• email address• mailing address	Direct marketing enquiries and, in the case of an existing Client, marketing communications about completed projects. Direct sales and marketing enquiries about new or renewed services, customer satisfaction surveys, invitations to marketing events and conferences.	The legitimate interest of DIGIC Pursuant to Article 6 (1) (f) of the GDPR.	15 years as of the recording of the data.

DIGIC does not carry out profiling of the Customers.

2. Persons having the right to access the data

Personal data is treated confidentially by DIGIC.

Only the following persons shall have access to the data:

- CEO
- Head of Production
- Intercompany Project Officer
- Account Director, Account Lead
- Producer
- Head of Studios
- Director of Digic Services

Employees of the following Divisions are also entitled to access the data:

- Account team
- Communication team
- Sales team

3. Data storage, security measures

The data is stored electronically in a spreadsheet created in DIGIC's Google Workspace application, which is password protected and has restricted access.

4. Exercising the rights of data subjects

4.1. Right of access

Pursuant to Article 15 of the GDPR, the Data Subject has the right to request information at any time on whether and how his or her personal data are processed by DIGIC, including the purposes of the data processing, the recipients to whom the data have been disclosed or the source from which the data were obtained by DIGIC, the retention period, any of his/her rights in relation to the processing and, in the case of transfers to third countries or international organisations, information on the safeguards relating thereto.

In exercising your right of access, you also have the right to request a copy of the data as follows:

- In your request, you must specify the Project Discussion (date and time) of which a copy of the recording you request.
- The right to request a copy must not adversely affect the rights and freedoms of others, i.e. if other data subjects are identifiable in the recording, DIGIC will take technical measures (such as image editing, including obscuring or blurring) to protect the rights of third parties.
- Please note that the data are, in view of their content, trade secrets of DIGIC, which you are obliged to keep confidential – with due consideration of your employment relationship or other work-related legal relationship with DIGIC or its partner – and any use of the data in violation of such trade secrets is prohibited.
- If your request is excessive or manifestly unfounded, DIGIC may charge you a reasonable fee under Article 12(5)(a) of the GDPR or refuse to act on your request (Article 12(5)(b) of the GDPR).

4.2. Right to erasure ('right to be forgotten')

Under Article 17 of the GDPR, if you request the erasure of any or all of your personal data, DIGIC will delete them without undue delay:

- if they are no longer necessary for the purpose for which they were originally stored or if the processing is unlawful,
- if you exercise your right to object and there are no overriding compelling legitimate grounds for the processing,
- if you withdraw your consent to the data processing.

Recordings cannot be erased if the processing is required for any of the following:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing of the personal data by Union or Member State law to which the controller is subject;
- c) for the establishment, exercise or defence of legal claims.

4.3. Right to restriction of processing

You may request restriction of the processing of your personal data on the basis of Article 18 of the GDPR in the following cases:

- the processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead;
- DIGIC no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.

4.4. The right to object

Pursuant to Article 21 of the GDPR, if the legal basis for the processing of your data is the legitimate interest of DIGIC or a third party, you have the right to object to the processing. DIGIC is not obliged to uphold the objection if it proves that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or that the processing is connected to the establishment, exercise or defence of the legal claims of DIGIC.

4.5. Right to rectification

Upon the Customer's request, DIGIC will correct inaccurate personal data concerning the Customer without undue delay. Taking into account the purpose of the processing, the Customer shall have the right to request the completion of incomplete personal data. The Customer shall notify DIGIC without delay of any change in the data recorded in the contract. DIGIC shall not be liable for any damage resulting from the failure to notify and may claim compensation for any damage suffered as a result of its breach of contract.

4.6. Right to make a complaint, right to legal remedy

If you consider that the processing of your personal data by DIGIC infringes the provisions of the currently effective data protection legislation, in particular the GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary, complaints can be filed with the Hungarian National Authority for Data Protection and Freedom of Information ("NAIH"). Contact data of the Hungarian National Authority for Data Protection and Freedom of Information:

Website: <http://naih.hu/>
Postal address: 1363 Budapest, Pf.: 9.
Address: 1055 Budapest, Falk Miksa utca 9-11.
Phone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu

You can also take legal action under the GDPR and the Information Act. Your detailed rights and the available legal remedies are specified under Chapters III and VIII of the GDPR and Article 23 of the Information Act.

4.7. Time limit for replying to data subject requests

DIGIC will ensure that if you exercise any of your rights in relation to this processing and contact DIGIC, DIGIC will respond to such requests without undue delay and in any event within 30 days.

If you wish to exercise any of your rights, or if you have any questions or comments, please contact us using the contact details provided in Section 1 of this Notice. Please contact the DIGIC entity with which you or your employer have a contractual relationship!