



## 1. Basic data

Name of the data manager: APP Ltd.

Seat of the Data Manager: 9028 Győr, Fehérvári Street 75.

Electronic contact of the Data Manager: [info@diadem.com](mailto:info@diadem.com)

Legal representative of the Data Manager:

Péter Csizmadia, owner, executive director

Szilárd Csizmadia, general director

Alexandra Sinkó, general director

Renáta Berkes, general director

Legal basis:

The European Parliament and the European Council's (EU) Regulation no. 2016/679 (hereinafter referred to as "GDPR")

Act CXII of 2011 on Information self-determination right and the freedom of information (hereinafter: Infolaw)

## 2. Data management rules

General data protection responsible: Renáta Berkes, Alexandra Sinkó

The timely effect of this data management announcement is from 25 May 2018, until its revocation.

As the operator of [www.diadem.com](http://www.diadem.com); [www.zoldteto.hu](http://www.zoldteto.hu); [www.grundach.com](http://www.grundach.com), (hereinafter: Website), the Data Manager shall inform its visitors that regarding this website, personal data is managed only in accordance with the present data protection announcement.

This announcement is made on the basis of the Data Protection and Data Management Regulations of APP Ltd., its scope extends to all processes implemented during the operation of the website managed by PP Ltd., where management of personal data is implemented, as defined in Act CXII of 2011 on Information self-determination right and the freedom of information (hereinafter: Infolaw) 3§ par. 2.

The concepts of the present announcement are consistent with the interpretative glossary in Infolaw 3. §.

The APP Ltd. declares that personal data is handled only in order to exercise his/her rights or to fulfil his/her obligations. The managed personal data shall not be used for private purposes, and data management is always in compliance with the principle of bound to purpose - if the purpose of the data management is terminated or the data management is otherwise illegal, the data will be deleted.

The APP Ltd. handles personal data only on the basis of the prior consent of the Data subject or statutory provision.

The purpose of this Announcement by APP Ltd. is to provide the Data subject with the purpose of the data management in all cases, as well as the legal basis of the data management and all relevant information regarding the data management.



Employees who manage data in the organizational units of APP Ltd. are obliged to keep the personal information they became aware of as business secrets, and for this purpose our employees who handle personal data and have access to them have made a confidentiality statement.

The executive director of APP Ltd. with a prevailing decision-making competence defines the data protection organization, defines the data protection- and the related tasks and responsibilities, and selects the person who handles the data management, taking into account the specialties of APP Ltd.

The staff of APP Ltd., during their work, are also obliged to take care of the prevention of unauthorized person's access to personal data. The storage and placement of personal data is designed to be unavailable, unrecognizable, unalterable or indestructible by an unauthorized person.

### 3. The enforcement of rights of Data subjects

The natural person who is directly or indirectly identifiable based on the personal data, according to GDPR Chapter III, par. on The Rights of the Data Subject, may request information about the management of his/her data, ask for the correction of his/her data, ask for the deletion of his/her data (with the exceptions defined in legislation) or transmitting those to third party via the central contact of the APP Ltd. ([info@diadem.com](mailto:info@diadem.com)).

APP Ltd. will reply in writing, in a readable form, within 30 days of the receipt of the request - within 15 days in case of exercising right to object - regarding the management of the data of the Data subject.

The information covers the information defined in Infolaw 15. § par. (1), where the relevant information cannot be denied under the applicable law.

The information is free of charge as per the main regulations, APP Ltd. may claim any fees only in case defined in Infolaw 15. § par. (5).

The APP Ltd. may refuse such request for reasons defined as per Infolaw 9. § par. (1) or 19. §, and this may happen only in writing with justification of the refusal, as per Infolaw 16. § par. (2).

Incorrect data shall be corrected by the data protection officer of the Data Manager - in case the required data and the documents verifying those are made available - in cases defined in Infolaw 17. § par. (2), the competent person shall perform the deletion of the managed personal data.

For the period of the decision related to the objection of the Data subject regarding the management of his/her personal data, which is 15 days from the submission of the request, the Data Manager suspends the management of data - for up to 5 days -, examines the basis of the objection and makes a decision, about which the Data subject is notified as per Infolaw 21. § par. (2).

If the objection is justified, the Data Manager organizational unit's head shall act as per Infolaw 21. § par. (3).

APP Ltd. also reimburses any damage caused to others by the unauthorized handling of the data of the Data subject or by violating the requirements of data security or by the breach of personal rights caused by the data processors which the Data Manager utilized. However, APP Ltd. is exempted from liability for damages and damage compensation if it proves that the damage to the Data subject's privacy rights is caused by an unavoidable cause outside of the scope of Data

Manager. Likewise, it does not compensate for damages if it is due to the intentional or gross negligence of the injured party.

The Data subject can contact the NAIH with a complaint about the procedure of data management by the APP Ltd.:

National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és  
Információszabadság Hatóság - NAIH)  
1024 Budapest, Szilágyi Erzsébet alle 22/c.

[www.naih.hu](http://www.naih.hu)



#### **4. Data management implemented when using the APP Ltd.'s website**

##### **4.1. Location of data management**

APP Ltd. head office  
H-9028 Győr, Fehérvári Street 75.

##### **4.2. Data management of the website**

Anyone may access the Website of APP Ltd. without any identity disclosure and providing personal data, and freely without any restrictions can get information on the website and the linked pages. However, information not linked to persons is collected unlimitedly and automatically by the Website about its visitors. However, personal data cannot be obtained from these data, so data management as per Infolaw is not implemented.

The APP Ltd. Website uses Google Analytics, a web analytics service. Google Analytics uses "cookies", which are text files on the computer of the Website visitor, to help analyse the use of the Site. Information generated by cookies on the use of the Website (the Website visitor's IP address) is forwarded to and stored by Google's U.S. servers.

Google does not link cookie-generated information with other data - so it does not implement personal data management under the current data protection regulations. You can refuse the use of cookies by selecting the appropriate settings on the Browser of the Website visitor.

By using this Website, the Website visitor will consent to the processing of his/her data for the purposes and by the methods specified above.

Google will use the information above to evaluate, analyse your use of the Website, to make reports on your activities on the Website, and to provide other services related to the use of the Website and to other Internet-related activities.

##### **4.3. Contact with APP Ltd.**

On the homepage of APP Ltd., the visitor has the opportunity to contact with APP Ltd. By filling a form, the user may enter the required relevant data for the contact. However, the Data subject may send the data only if he/she accepts the data management rules of APP Ltd., this can be done by checking in a checkbox; otherwise he/she can't send the message.

##### **4.4. Legal basis of the data management**



The legal basis of the present data management is the consent of the Data subject [Infolaw 5.§ par. 1. section a) and 6. § section 6], according to which "at the request initiated by the Data subject, for the purpose of other matters, the consent of the Data subject shall be protected, in regards of the personal data provided". Further legal basis is GDPR Article 6 par. 1 section a).

The purpose of the data management: facilitating making contact with APP Ltd.

Scope of managed data: company name/name; email address; subject; message text

Legal basis of data management: consent of the Data subject as per Infolaw 5. § par. (1) section a). Data storage deadline: until the matter of making the contact is taken care of (fulfilment of the purpose)

Data storage method: electronic

## **5. Issues not specified in the present announcement**

Regarding issues not covered by this Announcement, Infolaw and the rules of GDPR are applicable.