DATA PROTECTION AND DATA HANDLING POLICY

1. PURPOSE OF POLICY

1.1. The Data Protection and Data Processing Policy (hereinafter the Policy) covers the principal rules and regulations of data protecion and principles of data recorded by Total Felhő Kft. (hereinafter the Provider) with particular attention to data handling, processing, transmission and disclosure. The purpose of the Policy is to specify the principals and rules of data protection and processing and the method and conditions of data processing of Supplier according to Hungarian and EU legislation in conform with the interests of data subjects.

1.2. The Provider operates www.tc2.hu website (hereinafter: Website), and process data of the Website users in this regard.

1.3. The Policy is in conform with Act CXII of 2011 on Freedom of self-determination of information and freedom of information (hereinafter Act on Information), Act CVIII of 2001 on Aspects of Electronic Trade Services and and Services on Information Society (hereinafter Act on Electr. Trade), AC XLVIII of 2008 on Major Terms and Limits of Economic Advertising and Regulation (EU) 2016/679 of the European Parliament and the Council 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 (General Data Protection Regulation).

1.4 The Provider reserves the right to inform data subjects on any modificaton of services or general contract terms in e-mail. The Provider shall not use this communitacion for advertising pruposes.

2. PROVIDER'S DATA:

Company name:	Total Felhő Kft.
Address:	3530 Miskolc, Széchenyi utca 88.
Co. reg. no.:	05-09-028118
Tax no.:	25335725-2-05
Contact:	Révész Róbert Gábor ügyv.
	Serfőző József adatv.megb. gdpr@tc2.hu

Website operator: Total Felhő Kft.

Server operator:

Company name:	Amazon Web Services, Inc.
Address:	Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg
Co. reg. no.:	-
Tax no.:	-
Contact:	TC2 Ltd. as local partner

Newsletter operator:

Company name:	The Rocket Science Group, LLC
Adress:	675 Ponce de Leon Ave NE, Suite 5000 Atlanta, GA 30308 USA
Co. reg. no.:	-
Tax no.:	-
Contact:	DPO, legal@mailchimp.com.

3. DATA HANDLING OF PROVIDER

3.1. Contact us webform, recorded data:

- Full name of contact person
- E-mail address
- Companyname
- Position

Before submitting the 'contact us webform', the user gives consent to handling their data by clicking on ackowledging the acceptance of the Provider's Data Handling Policy.

Purpose of data handling: identification of client to provide information about Provider's services.

Legal basis of data handling: voluntary consent of the user

Period of data handling: 30 days or until the user's request to delete their data

Method of data storage: server of Provider

3.2. Contact by email (sending free text email) recorded data:

- Name of user
- E-mail address
- Information provided

Purpose of data handling: identification of client to provide information about Provider's services.

Legal basis of data handling: voluntary consent of the user

Period of data handling: 30 days or until the user's request to delete their data

Method of data storage: server of Provider

3.3. Recorded data required for the use of professional information:

- Full name of contact person
- E-mail address
- Companyname
- Position

Before submitting the 'contact us webform', the user gives consent to handling their data by clicking on ackowledging the acceptance of the Provider's Data Handling Policy.

Purpose of data handling: identification of client to provide professional information about a specific topic.

Legal basis of data handling: voluntary consent of the user

Period of data handling: 60 days or until the user's request to unsubscribe

Method of data storage: server of Provider

3.4. Newsletter subscription, recorded data:

- Full name of contact
- E-mail address

Before subcribing to the Newsletter, the user gives consent to handling their data by clicking on ackowledging the acceptance of the Provider's Data Handling Policy.

Purpose of data handling: sending out information to the subscriber about industry news, company news, services, actions.

Legal basis of data handling: voluntary consent of the user

Period of data handling: until the user's request to unsubscribe

Method of data storage: server of Provider

4. LIABILITY

The Provider shall not verify accuracy of any personal data registered by the User. User shall be liably exclusively for accuracy of any data registered by him. User shall be liable for disclosure and process of data transferred by the Provider to the e-mail adress registered by the User.

5. HANDLING OF REGISTERED DATA

Provider and personnel providing data procession have right to know data regisatered by the User. Senior executive of Provider has right to determine the access right of data handling of Provider. In case of assigned data process the senior executive of assigned data processor shall determine the access right. Provider has right and obligation to transmit data to any third person in order to fulfill its obligation required by law.

6. RIGHTS OF USER

6.1. User has right to request information free of charge about his/her personal data handled, purpose, legal basis and period of data handling, name, address (official seat) and processing activity of any person authorized for data handling or processing and tho whom and what data are disclosed and rights of data subject and remedies. User has right to request free of charge any adjustment, deletion, closure, handling limitation of his/her data or protect against data handing in any case stipulated in law.

6.2. Provider shall inspect the request of User as soon as possible but not later than 30 day – in case of protection, within 15 days – and sends a written decision to the User. In case the request of User is not fulfilled, Provider shall inform the User about the reasons of facts and law of refusal

6.3. User has the right to court remedy according to Act V of 2013 on Civil Code or submit a claim to National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf. 9.; https://www.naih.hu/panaszuegyintezes-rendje.html)

7. MISCELLANEOUS

7.1. Provider collect data about activity of users by applying a method not suitable for idetifying users or combining any personal data supplied by users for registration or using other websites or services.

7.2. Provider shall inform User previously and request the clear approval in advance in case Provider intends to use personal data of User for any other data handling purpose other than identified by Provider.

7.3. Provider shall ensure safety of data handling and processing and take all suitable technical measures in order to protect data registered, stored and handled as well as unauthorized process, modification or deletion.

7.4. Provider shall record data handling as required by law (data handling register).

7.5. Damage of of safety shall be considered Data Handling Incident in case its result is accidental or illegal deletion, loss, change, illegal disclosure or illegal access of any personal data handled. Provider shall take measures in case of DHI as regulated in Article 33 and 34 of GDPR. Provider shall record each DHI registering facts, effects and remedies

7.6. Provider has right to unilaterally modofy the Policy. Provider shall publish modifications on its website. User has right to use services of the website with admission of modifications of Policy.

Enter into force: July 6, 2021.