

Data Privacy

As a result of the General Data Protection Regulation (GDPR) went into force on the 25th of May 2018, MagiCom has updated its Privacy Statement. We would like to inform you of these changes which took effect on the 25th of May 2018 – you can find them in the summary below. You can also click the link below to read the full updated statement.

Summary of changes

The following changes have been made and took effect on the 25th of May 2018:

- We have updated some of our service offerings;
- We explain the legal grounds for processing your personal data;
- We state which parties may have access to your personal data;
- We inform you about how long we will keep your personal data;
- We clarify which rights you have under the GDPR and how you can invoke these rights.

Updated Privacy Statement

Who are we?

Since 2001, MagiCom (and its partner companies as E-Trend Ltd., MC ITS Ltd.) provides services in the fields of

Near shore outsourcing (mainly IT infrastructure design & build, project and program-management, integration, divestiture and acquisition)

Software development

Security consulting and training

In principle, MagiCom Ltd (“MagiCom”) established in Budapest, at Táncsics M. street 77/B in Hungary (H-1188), is as data controller responsible for the processing of all your personal data.

If you participate on an event organised by MagiCom in cooperation with other professional bodies and organisations, then this third party will be also as data controller responsible for the processing of your data.

Which data does MagiCom collect?

MagiCom collects and processes the following personal data:

For all of our services: your name, job title and contact information;

In order to use of our services, you must be registered in our system. We will ask you to provide personal data, including your name, job title, mailing / delivery address, e-mail address and other contact information. The requested information depends on the service. The provision of specific data can be required to use our products and services. This will be shown when the information is requested.

For which purposes will your data be processed?

MagiCom collects and uses your personal (contact) data:

For providing information to your requests based on your questions and queries,

For our own business related administration;

We use your personal data for internal administration purposes, such as record keeping and to comply with our legal and fiscal obligations.

To provide information and reply to your questions;

If you ask any questions or if we need to provide information to you (e.g. events, meeting options, etc.), we will use your data to contact you.

To send you our newsletter or personalized offers on MagiCom services;

Results of statistical analyses will not be used for marketing activities targeted especially at you, unless with your prior consent.

To comply with statutory rules and regulations.

MagiCom collects, stores and uses your data to comply with MagiCom's legal and fiscal obligations.

Legal basis for processing personal data

MagiCom processes your personal data to provide our products and services to you, to comply with legal obligations we are subject to, if it is necessary for our legitimate interests or the interests of a third party, or on the basis of consent.

When we process your personal data for our legitimate interests or the interests of a third party, we will take reasonable measures to prevent unwarranted harm to you. Our legitimate interests may, for example, include our interest of improving our product and services. More information on the

balancing tests we perform is available upon request. Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (please see Section 11 “Your rights” below).

Where we process your personal data on the basis of your consent, you may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent, by adjusting your setting (if available) or by reaching out to us.

Where we process your personal data for a purpose other than that for which we collected it initially (and we rely on a legal basis other than consent or complying with legal obligations for this new purpose), we will ascertain whether processing for this new purpose is compatible with the purpose for which the personal data were initially collected.

In which way does MagiCom obtain data?

MagiCom obtains your personal data in several ways.

We obtain personal information about you when you register to our services (i.e. web-shop products, consulting services etc.)

Who has access to your data?

In view of the purposes mentioned above, or in the context of its service provision MagiCom may share, pass on or in any other way make accessible your personal data to MagiCom group companies, other service providers and third parties who may offer additional services for you.

We have an authorization policy for our systems, so persons and organizations only have access to your data in so far as this is necessary for the performance of their tasks and within the framework of the purposes mentioned. All these individuals and organizations have agreed to treat your data confidentially and with the greatest care.

Next to that, the extent to which we share your data and with whom, depends on the service required.

Parties that have access to your data may be established in countries that have a milder privacy regime than the European Union and Hungary. If such is the case, MagiCom will ensure that appropriate measures are taken and that all statutory rules and regulations are observed. For transfers of personal data outside the European Economic Area, MagiCom will use European

Commission approved mechanisms, such as the Privacy Shield certification, and Standard Contractual Clauses as safeguards, such as the “(EU-)controller to (Non-EU/EEA-) controller” Decision 2004/915//EC (see Article 46 GDPR). If you wish to receive a copy of these procedures, regulations and safeguards, please contact us.

Security

MagiCom implemented appropriate technical and organizational measures to ensure an appropriate level of security against unlawful use, unauthorized access, alteration or unlawful destruction of your personal data. MagiCom has an Information Security Management System based on ISO / IEC 27001:2013 and the system is regularly audited and certified by SGS. If you are interested in detail you can have access to our certificates.

Retention Period

MagiCom retains your personal data as long as necessary in view of the purposes set above, or as long as prescribed by law. Based on these purposes, MagiCom has determined two separate retention periods for different sorts of personal data consisting of 3 years or 5 years.

Personal data that is required for MagiCom to comply with MagiCom’s legal and fiscal obligations will be kept for 3 or 5 years, after which they will be deleted or anonymized.

Cookies

Our website makes use of cookies to register visitor data in order to further optimize the website’s functionality and to improve its security. You can change the settings of your browser in such a way that you no longer receive cookies. If cookies are disabled, MagiCom cannot guarantee that all services and functionalities of its website function properly.

Links to other websites

On our website, you can find several links to websites of third parties. If you follow these links, you will leave the MagiCom website. Although all links have been selected with care, MagiCom cannot be held responsible for the use of data by these organizations. To learn more, read the privacy statement of the website you visit, if available.

Your rights

You may contact our Data Privacy Officer (please see below) to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing.

Right to access

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

Right to rectification

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

Right to erasure

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

Right to restriction of processing

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continue storing your personal data. We will inform you before the restriction is lifted.

Right to data portability

Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.

Right to object

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see Section 4 "Legal basis for processing personal data" above).

At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent.

For example, you may withdraw consent, by clicking the unsubscribe link in the email, adjusting your communication preferences in your account (if available) or by changing your smart phone settings (for mobile push notifications and location data).

To exercise any of the above-mentioned rights, please contact us using the contact details stated under Section 13 below.

You can also contact us at if you have any questions, remarks or complaints in relation to this privacy policy. However, if you have unresolved concerns you also have the right to complain to the Hungarian Data Protection Authority (NAIH <https://naih.hu/>) located in Budapest, or, if you live or work in another EU member state, you can lodge a complaint with the supervisory authority of that EU member state.

How we look after this policy

This privacy policy was most recently amended on May 24, 2018 and replaces earlier versions. We may amend this privacy policy from time to time and will notify you of any changes prior to these changes taking effect.

Contact details

If you have any questions regarding this policy or the processing of your personal data, please contact us:

MagiCom Ltd.

Attn. Data Privacy Officer

Szent László tér 20.

H-1102 Budapest

Hungary

E-mail: dpo@magicom.com