

Privacy Notice – Consortix quiz (“Quiz”)

Your privacy and Consortix Kft.

Consortix Informatikai Tanácsadó Korlátolt Felelősségű Társaság (Registered seat: 1036 Budapest, Lajos utca 74-76., Company reg. no: 01 09 201818, Fiscal no: 25134847-2-41, hereinafter: “**Consortix Kft.**” or “**Company**”) is a **data controller**, therefore responsible for deciding how the Company holds and uses personal information about its Clients. The Company constantly aims to improve the security of your personal data whether from malicious threats or inadvertent breaches in day-to-day working practices. Consortix Kft wants the involvement of every Client and, as part of this, are providing this privacy notice setting out the types of data we hold about you, where and why it’s held, who it can be shared with and how we review and delete data we have no further need to retain. Consortix Kft will only use your personal data where there is a lawful basis for doing so.

In this notice, “**Client**” means the **data subjects**, therefore every natural person, so as partner, client, an employee, worker, contractor, volunteer, apprentice, trainee, or any other kind of individual taking part of the Quiz.

In this notice “Quiz” means the following: questions regarding the AML AI readiness and different results (showing on the screen) based on the score.

Term “Consortix Group” refers to any and all companies, firms and legal entities with respect to which now or hereafter Consortix Kft. directly or indirectly holds fifty percent (50%) or more of the nominal value of the issued share capital, or fifty percent (50%) or more of the voting power at general meetings or has the power to appoint a majority of directors or otherwise to direct the activities of such company, firm or legal entity.

The kind of information the Company intends to hold:

The Company will hold your personal data as part of your engagement with our Quiz. Considering the content of 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 (“**General Data Protection Regulation**” or “**GDPR**”) the **personal data means**: any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection. Special Category data is information revealing an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric (e.g. fingerprints or facial recognition) or genetic information, health or sexual orientation.

Examples of the personal data that we will collect, store, and use about you are set out below:

- name
- e-mail address
- institution and
- any other data provided by the data subject in the field.

We will only collect, store, and use the following Special Category data: N/A

How is your personal data collected?

You directly provide our Company with most of the data we collect. We collect data and process data when you:

- register online for the Quiz,
- use or view our website via your browser’s cookies,
- by using the messaging function, called ‘CONTACT US’
- voluntarily and directly send the data via email,
- download documents and the Company, as data controller can contact them directly in the future,

Our Company may also receive your data indirectly from the following sources: N/A

The basis for using your personal data:

The Company will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- contacting between the Company, as data controller and a Client(s), as data subjects, providing more information about the service related to the Quiz,
- to respond to any requests and questions posed by the Client(s).

Do we need your consent? - Legal basis of the data processing:

The Company processes personal data of the Data Subject (Client) pursuant to Article 6(1)(a) of GDPR (subject to your approval). The express approval is provided in advance of the initiation of data processing; either by ticking the checkbox before downloading the document or via e-mail.

Data sharing - Data transfer and processors:

Data transfer: The Company does not transfer the provided personal data of the data subjects neither to third party in the EU, nor to third country, nor to any international organization. We will share your personal data with third parties where required by law, where it is necessary in relation to the relationship with you or there is another legitimate interest in doing so. In this case "Third parties" includes, but is not limited to third-party service providers and other entities including payroll, banks, pension administration, benefits administration, and IT services, relevant colleagues of the organization of the Company, in particular sales and marketing colleagues (or in case the message is related to service/product of the Company) may have access to the above-mentioned personal data voluntarily provided through the incoming message.

All our third-party service providers and other entities in Consortix Group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Additionally, the Company will share your personal data with other entities in Consortix Group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data, the operation of businesses within Consortix Group and provision of services or access to databases. Moreover, the Company may need to share your personal data with a regulator or to otherwise comply with the law.

Data processors: For processing purposes, data controller (Company) uses the services of the following data processors:

Name and contact details of the data processor: Positive by Hinora Group Ltd.
address: Délibáb str. 29. Budapest 1062 Hungary
email: dpo@positive.hu

Processing operations provided by the data processor:

Operation of websites, webhosting services.

Place and method of data processing: The voluntarily provided personal data of the Client, as data subject is stored by the webhosting data processors entrusted by the Company, as data controller, on the servers of data processors, in the territory of the European Union.

Marketing:

The Company would like to send you information about services of its that the Company thinks you might like. If you have agreed to receive marketing, you may always opt out at a later date. You also have the right at any time to stop the Company from contacting you for marketing purposes or giving your data to other members of Consortix Group.

If you no longer wish to be contacted for marketing purposes, please write us at info@consortix.com .

Data security:

The Company work constantly to maintain and improve security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to staff or parties who have a business need to know, such as third parties who have a specific right to audit or access information under contractual terms. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach when required.

Data retention:

How long will you use my information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, and other business-related requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will hold your personal data whilst you are a Client. Once you are no longer a Client, we will retain your personal data in accordance with applicable laws and regulations and for so long as required for us to comply with legal requirements, following which point it will be securely destroyed.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Informing us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information:

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.

Right to withdraw consent:

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us at dataprivacy@consortix.com

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice:

This privacy notice may be updated at any time to take into account any changes to our processes, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

If you have any questions about this privacy notice, please contact us at dataprivacy@consortix.com

Contact the appropriate authority:

Should you wish to report a complaint or if you feel that the Company has not addressed your concern in a satisfactory manner, you may contact the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság):

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Address: 1530 Budapest, Postafiók: 5.

Telefon: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Date: March 2021.