**Privacy Policy**

**on the processing of personal data of the natural persons appointed by Grape Solutions Zrt. as contacts, plus the natural persons appointed as contacts by other partners of Grape Solutions Zrt. in agreements and other documents for contact purposes**

**Preamble**

The present Privacy Policy shall apply to the management of personal data of the natural persons appointed as contact persons, contributors, representatives in the agreements and other documents concluded by Grape Solutions Zrt., plus the natural persons acting as contact persons, contributors, representatives of the potential (possible future) business partners of Grape Solutions Zrt., furthermore the natural persons acting as contacts, contributors, representatives of other authorities (municipalities, authorities, courts, administrative bodies, etc.) being in contact with Grape Solutions Zrt. (In this Privacy Policy contact persons, contributors, representatives are jointly referred to as contact persons.)

The Privacy Policy shall not apply in respect of the data management of legal persons other than natural persons.

1. **Name of the Data Controller, definition of personal data and Data Subject**

Data Controller is the legal person who alone or jointly with others determines the purposes and means of processing the personal data.

**In relation to this Policy the Data Controller is:**

**Data Controller: Grape Solutions Hungary Zártkörűen Működő Részvénytársaság** (in this Policy hereinafter referred to as: **Data Controller**)

Registered Seat: 1023 Budapest, Árpád fejedelem útja 26-28.

Postal address: 1023 Budapest, Árpád fejedelem útja 26-28.

Registration no.: 01-10-047087

Website: https://grape.solutions

E-mail address: support@grape.hu

Telephone no.: +36-1-880-9200

Data protection officer: dr. Józan Flóra

Availability: Jozan.Flora@nkm.energy

Representative: Gárdonyi Zsuzsa (Gardonyi.Zsuzsa@grape.solutions)

In respect of this Privacy Policy personal data shall mean any information relating to an identified or an identifiable natural person (hereinafter **Data Subject**). An identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier (such as name, identification number, location data, an online identifier, or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).

1. **Subject of this Privacy Policy, legislation serving grounds for the data processing**

The present Privacy Policy shall apply to **the following management of personal data of the natural persons appointed as contacts in the agreements and other documents concluded by the Data Controller:**

* **in respect of the natural persons appointed by Data Controller as contacts (employee, etc.) data processing under the performance of the employment agreement or other agreement the Data Controller has entered into with the Data Subject employee, etc.**

**and**

* **in respect of the natural persons appointed by the contractual partner of the Data Controller as contacts data processing under the legitimate interest of Data Controller and its contractual partner.**

In addition to the above the present Privacy Policy shall apply to the personal data of the natural persons acting as the contact persons, contributors, representatives of the potential (possible future) business partners of the Data Controller, plus the natural persons acting as contact persons, contributors of other authorities being in contact with the Data Controller (municipalities, authorities, courts, administrative organs, etc.)

* in case of the natural persons appointed by the Data Controller and proceeding as contacts data processing based on the employment- or other agreement concluded by the Data Subject employee, etc.

and

* in case of the natural persons appointed by the above defined external partners of the Data Controller the data processing under the legitimate interest of the Data Controller.

Main rules of law pertaining to the above data processing:

* Regulation (EU) 2016/679 of the European Parliament and of the Council on April 27, 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)
* Act CXII of 2011 on the right of informational self-determination and on freedom of information
* Act V of 2013 on the Civil Code (Civil Code)

**3. Legal grounds of the data processing**

The legal grounds for processing data primarily is the Regulation (EU) 2016/679 of the European Parliament and of the Council (**General Data Protection Regulation**) Article 6 section (1):

* subsection b) (processing is necessary for performance of a contract – in case of natural person employees appointed as contacts by Data Controller)

The natural person Data Subject appointed by Data Controller as its own contact in the given contract or document is in contractual relationship (employment relationship, other relationship aiming the performance of work, etc.) with Data Controller (employment agreement, engagement relationship, etc.), based on which it is his/her contractual duty (scope of job, etc.), to become the contractual contact person of Data Controller in the contracts to be entered into with its business partners.

Thus this data processing is necessary for the performance of the employment agreement, etc. between the Data Controller and its employee, etc.

* subsection f) (data processing is necessary for the purpose of legitimate interest – in case of natural persons appointed as contacts by business partners of the Data Controller) - In connection with the data processing for this purpose the prevailing balancing test is available at the data protection contact of Data Controller.

**According to the result of the balancing test performed by the Data Controller:**

The Company as data processor evaluates that legitimate interest under GDPR Article 6 subsection (1) point f) shall be the suitable legal ground for processing the contractual contacts’ personal data, furthermore during the data processing the interest or fundamental rights and freedoms of the data subjects do not suffer harm in such extent which would override the legitimate interest of the Company. (the data subjects’ interests or fundamental rights and freedoms do not prevail over the Company’s interest).

|  |  |
| --- | --- |
| Legitimate interest exist | A legitimate interest of the Company is to ensure keeping contact in connection with the contracts it concluded, ensuring communication with its contractual partners and by these facilitate the performance of the contracts.It is the legitimate interest of the Data Controller to store and use the personal data of the contact persons of its potential business partners and/or other external authorities for future official contacting and/or possibility of entering into a contract, which is in harmony with the Data Controller’s activity, marketing. |
| Data processing is necessary | The data processing is necessary because in the lack of contact details the communication with the contractual partners would become difficult, which can also result making the performance of the contracts more difficult.For the sake of reaching the business goals of the Data Controller and cost efficiency it is inevitable to process the availabilities of the contact persons of the potential business partners and/or other external authorities (electronic availabilities, telephone number, etc.). Should there be no central availabilities to the business partners and/or the external authorities or those are not known by the Data Controller then the business goals and/or contacting obligations with the external authorities could not be reached, performed by the Data Controller. The Data Subject contact persons’ personal data are the data of representative (employee, agent, other legal relationship) of the legal person, without whom the legal persons and the Data Controller could not make contact with each other. |
| The data processing is a proportional restriction in respect to the Data Subject | The Data Controller shall only process the personal data of the Data Subject contact person to the extent which is necessary for reaching its legitimate business goals and/or contacting other external authorities. The data processed do not include special category personal data, which supports the data processing. The Data Subject contact persons do not suffer harm from the data processing, the processing means a proportionate restriction to them since the Data Controller ensures the right that the personal data of the Data Subject will be erased from the registers of the Data Controller upon request or objection. The Data Controller restricts access to the personal data and limits it to its own employees. Furthermore ensures for the protection of data a proper firewall and virus protection, by this undertaking a risk proportionate protection of the data processing. |

**Further details of the data processing, the legal grounds for data processing as per the data processing purposes are defined in the table under section 12.**

1. **Purpose of data processing**

The purpose of processing the personal data of contractual contact persons:

**Purpose of processing the personal data of the contractual contact persons:**

* ensuring contact in relation to the performance of the subject contract, document, or in facilitating their performance, plus ensuring contact required for maintaining the contractual relationship,
* ensuring communication between the Data Controller and its contractual partner in connection with entering into, amending or terminating the contract, or the non-performance or defective performance of the contract.

**Purpose of processing the personal data of the contact persons of business partners an/or other authorities:**

* ensuring electronic and telephone availabilities of the contacts of the potential business partners and/or other authorities (municipalities, authorities, courts, administrative authorities, etc.),
* Data Controller can only keep contact with its potential business partners and/or other authorities through their contact persons, since legal persons are necessarily represented by natural persons (presently employees, agents, persons having other legal relationship, etc.), through whom communication and contact can be made with the legal person.

**Detailed definition of the data processing purposes of the data processing under this Privacy Policy are included in the table under Section 12.**

1. **Scope of data processed, source of the data**

**The detailed definition of the data processed during the data processing under this Privacy Policy are included in the table under Section 12.**

Sources of the data processed:

In case of natural persons appointed by the Data Controller as contacts in its contracts, documents and the person keeping contact with the potential business partners and/or other authorities the source of the data is the internal register of the Data Controller. In case of the data of the natural persons appointed by the Data Controller’s contractual or other partners in contracts, other documents the source of the data is the contractual- and other partner of the Data Controller. In case of contact persons of the potential business partners and/or other authorities the source of data is directly the Data Subject or public sources (e.g. contact data indicated on the webpage of the subject legal entity, organization).

1. **Persons having access to the personal data, reasons of data forwarding**

**The persons having access to the data defined in this Privacy Policy (persons within the organization of the Data Controller and external recipients) are included in the table under Section 12.**

**In case of the Data Processors detailed under section 9 the reason of the Data Controller’s data forwarding is that the Data Processors can attend their data processing tasks described undersection 9.**

1. **Term of processing, storing personal data**

The term of keeping the contact persons’ personal data defined in a contract, document shall extend maximum to the term of archiving applicable to the subject contract, document. The processed personal data shall be immediately deleted if the processing happened for purposes other than the ones defined by law or the purpose of the processing ceased to exist (e.g. the right to be a contact person has been terminated, the subject contract has been terminated and the below archiving term has expired).

**In case of contact persons of the potential business partners and/or other authorities:**

In the lack of the following we process the personal data of potential business partner and/or other authorities for maximum 6 (six) years, after this term the data will be erased.

We immediately erase the personal data if the data processing did not take place for the purpose defined by law, or the purpose of the processing has terminated (e.g. the contact rights of the contact person is terminated, the contact person reports that he/she does not work with the relevant potential business partner, authority any more, or does not wish to keep contact with the Data Controller).

**The term of the data processing in case of exercising the right of objection against the data processing as per the present Privacy Policy under the legal grounds legitimate interest:**

In consideration of the Article 21 of the GDPR the Data Controller clearly and separately from any other information specifically calls the attention of the Data Subject natural persons that all Data Subject contact person is entitled to object against the processing of his/her personal data under Article 6 subsection (1) point f.) as per this Privacy Policy for reasons in connection with his/her own circumstances. In such event the Data Controller cannot process his/her personal data any more, except if the Data Controller proves that the processing is justified by such compelling legitimate reasons which override the interest, rights and freedom of the Data Subject or which are related to the making, enforcement or protection of legal claims.

**The duration of the data processing under this Policy are included in the table under Section 12.**

1. **Data security**

Data Controller undertakes to ensure the protection of the personal data processed by Data Controller. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Data Controller shall implement appropriate technical and organisational measures and implement the procedures which ensure that the recorded, stored and processed data are protected, furthermore hinder the destroy, the unauthorized use and change of the data.

Data Controller obliges himself that it will call all third parties to whom Data Controller lawfully forwards or hands over data to comply with the requirements of data security.

Data Controller shall do it best to protect the personal data it processes against unauthorized access, transformation, disclosure, deletion or destruction, accidental destruction or damage. The processed data may only be accessed by the Data Controller, its employees and the data processors deployed by the Data Controller as per access levels, the data shall not be handed over to third persons not having right to access. The employees of the Data Controller and Data Processor shall only have access to the personal data as per scope of job, specific manner and access levels defined by the Data Controller and the Data Processor.

Data Controller for the sake of security of the IT systems shall protect its IT systems with firewall, and in order to prevent external and internal data loss use virus screens. Data Controller has also arranged for the control of all forms of incoming and outgoing communication for the sake of preventing misuse.

Data Controller and Data Processor qualifies and handles the personal data as confidential data. For the protection of the data files stored electronically in different registers Data Controller ensures that the data stored in the registers – save for the exceptions defined by law – could not be directly connected to the Data Subject.

Data Controller shall ensure a level of data security appropriate to the risk, including among others, as appropriate:

- the pseudonymisation and encryption of personal data,

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services used for the processing of personal data (operation- and development security, protection against intrusion and detection, prevention of unauthorized access),

- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident (prevention of data leak, handling vulnerability and incidents),

- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing (maintaining business continuity, protection against harmful codes, safe storage, forwarding, processing of data, safety training of employees).

When determining the appropriate level of security expressly such risks arising from the data processing shall be taken into account which result especially from the incidental or unlawful destruction, loss, modification, disclosure or unauthorized access to the personal data forwarded, stored or otherwise processed.

1. **Data processors**

Data processors are the natural or legal persons carrying out personal data processing on behalf of Data Controller. In connection with your personal data the following companies act as data processors (**Data Processor**):

| **Data Processor****name, seat, ID data** | **Activity of the Data Processor**  | **Personal data processed by the Data Processor** |
| --- | --- | --- |
| None | Not relevant | Not relevant |

Data Processors shall process the above personal data during the term of their contract with Data Controller and until the duration defined by law in relation thereof.

**10. Rights, enforcement of rights and legal remedies in connection with the data processing**

**10.1. Rights in connection with data processing**

The Data Subject may request from Data Controller the followings:

* to receive information about the facts pertaining to the data processing (before the start of the data processing or during processing),
* access to their personal data (provision of their personal data by Data Controller),
* to have their personal data rectified, or amended,
* save for the cases of compulsory data processing to have the processing of their personal data limited or to have their personal data deleted,
* right to data portability,
* may object against processing their personal data.

The Data Subject may submit its request to the Data Controller as per section 10.2 in writing. Data Controller shall perform the Data Subject’s request within one month by e-mail, letter sent to the availability provided by the Data Subject.

**10.1.1. Right to information (based on Article 13-14 of the General Data Protection Regulation)**

Data Subjects on the availabilities defined under section 10.2 may request information from Data Controller that:

* which personal data,
* under what legal grounds,
* for what purpose,
* from which sources
* for what duration are processed,
* are any data processors deployed, if yes their name, address and activity in relation to the data processing,
* to whom the Data Controller ensured access to or forwarded personal data, when and under what legal regulation,
* the circumstances, impact and the countermeasures taken related to any personal data breach,

**10.1.2. Right to access (based on Article 15 of the General Data Protection Regulation)**

Data Subject is entitled to receive response from Data Controller regarding whether the Data Subject’s personal data are processed by Data Controller and if personal data of the Data Subject are processed get access to their personal data subject to processing together with the following information from Data Controller as per section 10.2 in writing.

Data Controller will provide copy of the personal data undergoing processing to the Data Subject if that is not prohibited by law. If Data Subject has submitted its request by electronic means, then the information shall be provided to the Data Subject in a commonly used electronic form unless otherwise requested by the Data Subject.

**10.1.3. Right to rectification, supplementation (based on Article 16 of the General Data Protection Regulation)**

Through the availabilities defined undersection 10.2 the Data Subject may request in writing from Data Controller to modify any of his/her personal data (for example may change his/her e-mail address or post address or request rectification any of his/her inaccurate personal data).

Considering the purpose of the data processing the Data Subject is entitled to request from the Data Controller the supplementation of any of his/her incomplete personal data undergoing processing.

**10.1.4. Right to erasure (based on Article 17 of the General Data Protection Regulation)**

Through the availabilities defined undersection 10.2 the Data Subject may request in writing from Data Controller the erasure of his/her personal data.

Primarily the erasure of personal data may be requested if our data processing is based on your consent, e.g. you consented that your personal data (telephone number, e-mail) may be processed for contacting purposes. In such an event we erase the personal data.

If you have provided us your personal data for the purpose to perform a contract or under law then the related processing of these personal data will not automatically cease with the termination of the contract and we cannot perform your request for erasure.

In such event we have to process your personal data defined by law further on even after the termination of contract until the duration defined in this Privacy Policy.

**10.1.5. Right to restriction of processing (based on Article 18 of the General Data Protection Regulation)**

Through the availabilities defined undersection 10.2 the Data Subject may request in writing from Data Controller the restriction of processing of his/her personal data (by clearly indicating the restricted nature of data processing and ensuring processing separated from other data).

The restriction shall last until the reason determined by Data Subject makes the storage of the data necessary.

Restriction of data may be requested by the Data Subject for example if he/she thinks that his/her data has been processed by the Data Controller unlawfully, but it is necessary that the data should not be erased for the purpose of any court or administrative procedures initiated by the Data Subject.

In such cases until the notification of the authority or the court the Data Controller maintains the storage of the personal data which it only erases thereafter.

**10.1.6. Right to data portability (based on Article 20 of the General Data Protection Regulation)**

Through the availabilities defined undersection 10.2 the Data Subject may request in writing from Data Controller to receive the personal data concerning him/her, which he or she has provided to the Data Controller in a structured and commonly used and machine-readable format and forward these data to another data controller without hindrance from the Data Controller, if

* the data processing is based on consent pursuant to point a) of Article 6 (1) or point a) of Article 9 (2) of the General Data Protection Regulation, or
* based on agreement as per Article 6 Section (1) point b); and
* the data processing is carried out by automatic means.

**10.1.7. Right to objection (based on Article 21 of the General Data Protection Regulation)**

Through the availabilities defined undersection 10.2 the Data Subject may object in writing the processing of his/her personal data pursuant to point f) Article 6 (1) of the General Data Protection Regulation required for the enforcement of rightful interest of the Data Controller or a third party, including profiling based on those provisions. In such event Data Controller shall not further process the personal data, except if the Data Controller demonstrates compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

If personal data is processed for the purpose of direct marketing then the Data Subject is entitled to object at any time for the processing of the personal data for this purpose, including profiling if that is related to direct marketing. If the Data Subject objects the processing of the personal data for direct marketing purposes then the personal data may not be processed further on for this purpose.

**10.2. Enforcement of rights, legal remedies in connection with the data processing**

**Contacting the Data Controller**

We suggest that before initiating a supervisory- or court procedure first be so kind and contact and send to Data Controller your requests, complaints in connection with the processing of your personal data, thus we can examine and remedy those, and if valid we can perform your requests described under the above section 10.1.

Upon the enforcement of any rights of the Data Subject under section 10.1, upon any request for information, objection to data processing and complaint the Data Controller shall without delay and within the time required by the current rules of law examine the case, make the necessary arrangements in connection with the request and provide information in the matter for the Data Subject. Where necessary taking into account the complexity of the request and the number of the requests this deadline may be extended as defined by law.

Where the Data Subject makes his/her request electronically then information shall be provided as far as possible by electronic form means, unless the Data Subject requests otherwise. If the Data Controller does not take action on the request of Data Subject, Data Controller shall inform the Data Subject without delay and maximum within the deadline defined by law of the reasons for not taking action and on the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

**For the sake of enforcing your rights or if you have any questions, doubt about your data processed by the Data Controller or if you request information or wish to submit a complaint about your data or wish to exercise any of your rights under section 10.1 you may do so as a request by a data subject in letter, e-mail sent to the availabilities of the Data Controller.**

**Initiating a court procedure**

The Data Subject may seek judicial remedy against the Data Controller or against the Data Processor – in relation to the data processing operations falling in the scope of activity of the data processor – if in his/her view the data controller and the data processor engaged or instructed by data controller processed his/her personal data in breach of the provisions of the rules of law applying to processing of personal data or the General Data Protection Regulation.

The law suit shall fall into the competence of the tribunal. The law suit – upon the choice of the Data Subject – may be initiated before the tribunal competent based on the home address or the residential address of the Data Subject.

**Initiating a supervisory procedure**

The Data Subject for the enforcement of his/her rights may initiate an investigation or a supervisory procedure at the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa u. 9-11., post address: 1363 Budapest, webpage: <http://naih.hu>; tel.: +36-1-391-1400; fax: +36-1-391-1410; e mail: ugyfelszolgalat@naih.hu) on grounds of infringement or the imminent risk of infringement of rights in connection with processing of his/her personal data, especially:

* if in his/her view the Data Controller restricts his/her rights in connection with processing defined under section 10.1 or rejects his/her request to enforce any of such rights (launching an examination), or
* in his/her view during the process of his/her personal data the Data Controller or the data processor engaged by or instructed by Data Controller breaches the provisions on processing personal data defined by law or the mandatory legal regulation of the European Union (requesting procedure by supervisory authority)

**11. Encumbrances**

During the processing of the personal data described in this Privacy Policy automated individual decision-making, profiling does not take place.

Forwarding of personal data to third countries or international organisations does not take place.

This Privacy Policy can be found at https://grape.solutions website.

Data Controller reserves the right to unilaterally amend this Privacy Policy for the future. Data Controller will notify the Data Subjects of the amendments on its website and through the Intranet.

**12. Detailed description of the data processing**

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| --- | --- | --- | --- | --- | --- |
| **Purpose of the data processing** | **Processed personal data** | **Legal grounds of the data processing** | **Duration of the data processing** | **Persons having access to the data External recipients****(if any)** | **Purpose of disclosure****(if there is a recipient)** |
| **Ensuring contact in relation to the performance of the subject contract, document, or in facilitating their performance, plus ensuring contact required for maintaining the contractual relationship** | In respect of the natural persons appointed by Data Controller as contacts (employee, etc.)* name,
* position (scope of job)
* e-mail address,
* telephone number,
* postal address,
* telefax number.
 | **General Data Protection Regulation** Article 6 section (1) subsection b) (processing is necessary for performance of a contract)The natural person Data Subject appointed by Data Controller as its own contact in the given contract or document is in contractual relationship (employment relationship, other relationship aiming the performance of work, etc.) with Data Controller (employment agreement, engagement relationship, etc.), based on which it is his/her contractual duty (scope of job, etc.), to become the contractual contact person of Data Controller in the contracts to be entered into with its business partners. Thus this data processing is necessary for the performance of the employment agreement, etc. between the Data Controller and its employee, etc.  | Upon termination of the contract, document the archiving term applicable for the subject contract, document shall be 5 years (statutory limitation period) or 8 years from the date of termination.* We archive contracts, documents containing contacts’ personal data for 5 (five) years after their termination which is the general statutory limitation period in civil law [Civil Code Section 6:22. § subsection (1)]
* Contracts, documents to be archived under the Act on Accountancy we keep for 8 (eight) years [Act C of 2000 on Accounting Section 169. § subsections (1)-(3)].
 | Persons having access to the personal data at the Data Controller are the organization units taking part in the conclusion, performance of the subject contract, document, in case of legal dispute in connection with non-performance or breach of contract the units taking part in the settlement of the dispute, especially procurement division, legal division and the division professionally competent in respect of the contract.MVM Zrt.Corvus Consulting Kft.Borsfai Ügyvédi Iroda | Managing MVM Company Group and executing intergated business concepts tender advisory legal service, consulting |
| **Ensuring communication between the Data Controller and its contractual partner in connection with entering into, amending or terminating the contract, or the non-performance or defective performance of the contract** | In respect of the natural persons appointed by the contractual partner of the Data Controller as contacts:* name,
* position (scope of job)
* e-mail address,
* telephone number,
* postal address,
* telefax number.
 | **General Data Protection Regulation** Article 6 section (1) subsection f) (data processing is necessary for the purpose of legitimate interest) | Upon termination of the contract, document the archiving term applicable for the subject contract, document shall be 5 years (statutory limitation period) or 8 years from the date of termination.* We archive contracts, documents containing contacts’ personal data for 5 (five) years after their termination which is the general statutory limitation period in civil law [Civil Code Section 6:22. § subsection (1)]
* Contracts, documents to be archived under the Act on Accountancy we keep for 8 (eight) years [Act C of 2000 on Accounting Section 169. § subsections (1)-(3)].
 | Persons having access to the personal data at the Data Controller are the organization units taking part in the conclusion, performance of the subject contract, document, in case of legal dispute in connection with non-performance or breach of contract the units taking part in the settlement of the dispute, especially procurement division, legal division and the division professionally competent in respect of the contract.MVM Zrt.Continuo Kft.Corvus Consulting Kft.Borsfai Ügyvédi Iroda | Managing MVM Company Group and executing intergated business concepts tax advisorytender advisory legal service, consulting |
| **Keeping contact with potential business partners and/or other authorities** | The following data of the natural persons appointed by the potential business partners and/or other authorities (municipalities, authorities, courts, administrative authorities, etc.):* name,
* positions (scope of job)
* e-mail address
* telephone number
* postal address
* fax number
 | **General Data Protection Regulation** Article 6 section (1) subsection f) (data processing is necessary for the purpose of legitimate interest) | In the lack of the following we process the personal data of potential business partner and/or other authorities for maximum 6 (six) years, after this term the data will be erased.We immediately erase the personal data if the data processing did not take place for the purpose defined by law, or the purpose of the processing has terminated (e.g. the contact rights of the contact person is terminated, the contact person reports that he/she does not work with the relevant potential business partner, authority any more, or does not wish to keep contact with the Data Controller). | the organization units keeping contact with the potential business partners and/or other authorities, especially the employees of the commercial department, the departments keeping contact with the municipalities, authorities, courts, administrative authorities.MVM Zrt.Borsfai Ügyvédi Iroda | Managing MVM Company group and executing integrated business conceptslegal service, consulting |