



DATA MANAGEMENT INFORMATION

It is important for EUROGATE Logistics Limited Liability Company to ensure that the personal data of its subcontractors (hereinafter referred to as "Subcontractor") performing freight forwarding services are handled in accordance with the law and that personal data are protected during the processing of such data, and the following information is published in view of this:

1. Data controller:

- EUROGATE Logisztikai Korlátolt Felelősségű Társaság (abbreviated name: EUROGATE Kft.; foreign language name: EUROGATE Logistics Limited Liability Company; foreign language abbreviated name: EUROGATE Ltd.; hereinafter referred to as EUROGATE or the Data Controller)
- located at: **H-1021 Budapest, Hűvösvölgyi út 89.**
- company registration number: 01-09-919349
- electronic mail address: info@eurogate.hu
- landline phone number: +36 1 889 2500
- represented by: Mr. Adam Nagy - Managing Director

The main legislation applicable to the processing of data under this notice and the abbreviation used in this notice is 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 (hereinafter: General Data Protection Regulation or GDPR).

2. Purposes, legal grounds and duration of data management:

The Subcontractor is required to provide the following personal data in order to be registered in the EUROGATE "TMS" (Transport Management System):

- Company name, registered office and tax number of the subcontractor;
- Name, e-mail address, telephone number of the financial contact person of the subcontractor;
- E-mail address and telephone number of the subcontractor's contact person.

The Subcontractor may optionally provide the following personal data for the purpose of registration in the EUROGATE "TMS" system:

- Company registration number of the subcontractor.

The personal data must be provided in order for EUROGATE to be able to provide the Subcontractor with a freight forwarding order.

The legal basis for processing is the performance of the transport contract between the parties (Article 6(1)(b) of the General Data Protection Regulation).

The Contractor shall keep the personal data recorded and stored in the "TMS" system for 7 years.

3. Recipients of personal data or to whom the data may be disclosed:

The Data Controller only transfers data to its contracted processors to the extent necessary for the performance of the processors' contractual obligations.



Data processor:

data processor's name:	contact details	data subject to processing	purpose of processing
TRANSORG Szolgáltató és Kereskedelmi Korlátolt Felelősségű Társaság	1117 Budapest Hauszmann Alajos utca 4. A. ép. fszt. 6.; Tel.: (+36 1) 382-0750; Fax: (+36 1) 281-1912; E-mail: info@transorg.hu	name, billing address, telephone number, e-mail address	the TMS system operator, for system maintenance

4. The data controller does not transfer data to third countries. Third countries are countries outside the European Union.

5. Subcontractor's rights

a. Right to request information /Articles 13-14 of the General Data Protection Regulation/: the Subcontractor may request in writing from the Data Controller information that:

- what personal data,
- on what legal basis,
- for what purpose,
- from what source,
- for how long,
- whether it employs a data processor, and if so, the name and address of the processor, if any, and the data controller's activities in relation to the processing,
- to whom, when, under what law, to which personal data the Controller has granted access or to whom the Controller has transferred the personal data,
- the circumstances of any data breach, its effects and the measures taken to remedy it.

b. Right of access /Article 15 of the General Data Protection Regulation/: The Subcontractor has the right to receive feedback from the Controller as to whether or not his/her personal data are being processed and, if such processing is ongoing, the right to access the personal data processed and to request this in writing from the Controller, as set out in point a. above. The Controller shall provide the Subcontractor with a copy of the personal data that are the subject of the processing, unless this is contrary to other legal obstacles. Where the Subcontractor has submitted the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Subcontractor requests otherwise.

c. Right to rectification and completion /Article 16 of the General Data Protection Regulation/: The Subcontractor may request in writing that the Controller amend any of its personal data (for example, it may at any time change its e-mail address or postal address or request that any inaccurate personal data processed by the Controller be corrected by the Controller). Taking into account the purpose of the processing, the Subcontractor is entitled to request that its incomplete personal data processed by the Controller be duly completed.

- d.** Right to erasure ("right to be forgotten") /Article 17 of the General Data Protection Regulation/: the Subcontractor may request in writing to the Controller to erase his/her personal data. In principle, the erasure of personal data may be requested where the Controller's processing is based on the Subcontractor's consent, e.g. where the Subcontractor has given its consent to the Controller processing its data (telephone number, e-mail address) for the purpose of contacting it. In such a case, your personal data will be deleted. If the Subcontractor has provided his/her personal data for the performance of a contract or on the basis of law, the related processing of these personal data will not automatically cease upon termination of the contract, nor will the Controller be able to comply with his/her request for erasure. In such a case, the Controller shall continue to process your personal data after the termination of the contract in accordance with the applicable law for the period of processing set out in this Privacy Notice.
- e.** Right to blocking (restriction of processing) /Article 18 of the General Data Protection Regulation/: The Subcontractor shall have the right to obtain, upon written request, the restriction of processing by the Controller if one of the following conditions is met:
- the Subcontractor contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the Controller to verify the accuracy of the personal data;
 - the processing is unlawful and the Subcontractor objects to the erasure of the data and requests instead that the use of the data be restricted;
 - the Controller no longer needs the personal data for the purposes of the processing but the Subcontractor requires them for the establishment, exercise or defence of legal claims; or
 - the Subcontractor has objected to the processing pursuant to Article 21(1) of the General Data Protection Regulation, in which case the restriction shall apply for a period of time until it is determined whether the legitimate grounds of the Controller prevail over the legitimate grounds of the Subcontractor.
- Where processing is subject to a restriction on the basis of the above list, such personal data, except for storage, may only be processed with the consent of the Subcontractor or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State. The Data Controller shall inform the Subcontractor concerned of the lifting of the restriction.
- f.** Right to data portability /Article 20 of the General Data Protection Regulation/: The Subcontractor has the right to receive personal data relating to him/her that he/she has provided to the Controller in a structured, commonly used, machine-readable format and the right to transmit these data to another controller without hindrance from the controller to whom he/she has provided the personal data, if.
- the processing is based on consent within the meaning of Article 6(1)(a) or Article 9(2)(a) of the Data Protection Regulation or on a contract within the meaning of Article 6(1)(b); and
 - the processing is carried out by automated means.



- g.** Right to object /under Article 21 of the General Data Protection Regulation/: The Contractor has the right to object at any time, on grounds relating to his/her particular situation, to the processing of his/her personal data based on Article 6(1)(e) or (f) of the General Data Protection Regulation, including profiling based on those provisions. In such a case, the Controller may no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Subcontractor or for the establishment, exercise or defence of legal claims. Furthermore, the Subcontractor is entitled, pursuant to Article 22 of the General Data Protection Regulation, not to be subject to a decision based solely on automated processing, including profiling, which would have legal effects concerning him or her or similarly significantly affect him or her.

Exercise of rights: the Subcontractor may send its requests to the contact details of the Data Controller indicated in point 1 above, and the Data Controller will reply to the Subcontractor, according to the form of the request, within 30 days of receipt of the request at the latest.

h. Remedies in relation to data processing

Initiation of legal proceedings

The Subcontractor may take legal action against the Controller or the processor if it considers that the Controller or, in its opinion, the processor or a processor acting on its behalf or under its instructions, is processing its personal data in breach of the provisions on the processing of personal data laid down by law or by a legally binding act of the European Union.

The Tribunal shall have jurisdiction to rule on the action. The action may also be brought, at the choice of the Subcontractor, before the competent court in the place where the Subcontractor is domiciled or resident.

The Data Controller shall compensate the damage caused by the unlawful processing of the Subcontractor's data or by the breach of data security requirements, but shall be exempt from liability if the damage was caused by an unforeseeable cause outside the scope of the processing. The Data Controller shall not compensate the damage in so far as it was caused intentionally or through gross negligence on the part of the injured party.



Initiation of an administrative procedure

In order to enforce its rights, the Subcontractor may initiate an investigation or an official procedure at the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11; postal address: 1363 Budapest, PO Box 69; website: <http://naih.hu>; telephone: +36 1 391 1400; fax: +36 1 291 1410; e-mail: ugyfelszolgalat@naih.hu), on the grounds that a violation of rights has occurred or is imminent in relation to the processing of its personal data.

Budapest, 22. May 2023

**EUROGATE Logistics Limited Liability Company
data controller**