

**„SZÁSZ ÉS TÁRSA” BT.
GDPR – PRIVACY POLICY**

Regulation (EU) 2016/679 of the European Parliament and of 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) and Act CXII of 2011 on the Right to informational self-determination and on the freedom of information require prior information of the data subject.

The purpose of this Policy is to comply with the above legal requirement. The definitions of terms used throughout this Policy shall be identical to those stated on the GDPR and other national legal regulations, whereas issues not regulated herein shall be governed by the provisions set forth in the GDPR and the relevant national regulations, provided the latter does not contradict with the former.

In telephone calls and written or electronic communication, this Policy is referred to in addition providing information on the information on data controller and the purpose of processing.

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1. NAME AND CONTACT DETAILS OF DATA CONTROLLER AND ITS REPRESENTATIVE

Name of data controller:

„Szász és Társa” Bt.

Seat: 8000 Székesfehérvár, Radványi út 4. B. épület

Represented by Dr, Kornélia Szász Dr Szabóné, managing director

E-mail: kornelia.szasz@clinresearch.hu,

Telephone: 06-20-332-1142

(hereinafter as the Company)

2. NAME AND CONTACT DETAILS OF DATA PROTECTION OFFICER

Data protection officer of the Company:

dr. Gergely Kozma, private entrepreneur

www.adatorom.hu, info@adatorom.hu, 06-30-3889943

3. PROCESSORS OF THE COMPANY

Data processor processes personal data on behalf of the data controller. Personal data are provided with the following data processors in order to process them for us in compliance and harmony with our instructions and privacy policy and confidential and security measures. The following information are disclosed in connection with the data processors:

Company name	Address	Activity
		bookkeeping/auditing
		web storage services
Magyar Posta Zrt.	1540 Budapest, Dunavirág utca 2-6.	Postal services
		system administration

4. THE PURPOSE OF DATA PROCESSING; PROCESSED DATA

The Company shall collect the data presented in this Policy itself and shall manage data for the following purposes, and shall not manage data for other purposes (unless specifically indicated):

4.1 Data processed in connection with call backs

On the controller's website (<http://szaszcro.eu>) visitors may fill in a Contact Form to receive additional information on their preferred services.

Processed data	Visitors may give their name and e-mail address on the Contact Form, and based on the content of the message we also become aware of the services he or she is interested in.
Purpose of processing	Data are required to render services efficiently, to identify the content of the contract, and provide information.
Legal basis for processing	Data are processed in line with point a) paragraph (1) and clause 6 in GDPR, since the data subject consents to the processing of his data. Consent is requested following the provision of Privacy Policy, which is deemed a consent confirmed in writing. You have the right to revoke your consent at any time, but the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
Ground for data supply:	It is not established on legal rule or contract, is not mandatory, however, in the event of lack of contact details we are unable to provide you with information on our service.
Storage period	Data are stored by the end of the calendar year unless a contract is concluded.
Transfer	The messages also appear on the storage provided by the storage service provider.
Processing for other purposes	Data are processed for statistical purposes to determine the number of respondents.
Risk of processing:	The management of contact point data are deemed of low-risk by the controller, in which the rules on data protection and data security are followed.

4.2. Data processed in connection with persons involved in clinical research (patients) related to services provided by the Company

The Company concludes agreement via its Clients to coordinate and control clinical trials. The company collects your personal data from healthcare institutions involved in the study. Persons involved in clinical trials (hereinafter as: patient) accept and consent to participation in scientific research during clinical trial in line with Regulation EU no. 536/2014 on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC.

Processed data	It is allowed to process personal data required to the fulfilment of the clinical study contracts, such as identification number, health data related to clinical research, and personal health status data.
Purpose of processing	It is required to implement and document clinical trials in compliance with the relevant rules.
Legal basis for processing	The legal basis for processing treated persons shall be point b) paragraph (1) and clause 6 in GDPR in the GDPR, based on agreed contract, considering that there is a contractual relationship between the treated person and the health institution, the principal pharmaceutical company and the health institution, the principal pharmaceutical company and the company, the company and the health institution to perform clinical studies.
Ground for data supply:	It is based on contract and mandatory to supply, otherwise we are unable to contract with you, because we cannot identify you.
Storage period	Personal data are stored as long as the service is provided or withdrawn of consent by data subject (request for erasure), or, in other cases, by the end of the 8 th year for the purpose of preserving bookkeeping documents.
Transfer	Data are transferred to data storage service provider as processor (cloud service provider). GOOGLE LLC is considered as a safe third country. https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI For taxation and bookkeeping purposes the personal data (name, address) are transferred to the bookkeeping company.
Processing for other purposes	When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject. In the event of data breach, data transfer (name and email address) may also take place in the course of notification in the interest of fulfilment of the above liability, as per Article 34 in the GDPR.
Risk of processing:	The company deems the processing of contractual data company is of medium risk, in which additional attention is paid to observe the provisions set forth in the Privacy Policy to prevent loss, destruction, change, unauthorized disclosure, and access to contractual data. In order to ensure the rights due to data subject, the company has added an additional supplement to the contract; persons who signed confidentiality statement are authorized to manage data.

4.3 Processed data on healthcare employees involved in clinical trials related to services provided by the Company

The Company concludes agreement via its Clients to coordinate and control clinical trials, in which contributing healthcare employees are involved (hereinafter as: You). The company

5. WHAT DATA SECURITY MEASURES SHALL WE APPLY TO PROTECT YOUR DATA?

The computing systems and other data retention locations of our company are located at the seat of the company and cloud services are also employed: GOOGLE LLC is considered as a safe third country. <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>.

In order to manage personal data for the provision of the service, the company selects and manages the IT tools used in a way that:

- it is accessible for the authorized persons (availability);
- its authenticity and certification are provided (credibility of data management);
- its unchanged nature can be verified (data integrity);
- it is protected from unauthorized access (confidentiality of data).

The company takes technical, organizational, and other IT measures to warrant data security that provides a level of protection that is in accordance with the related risks.

In the course of data protection, the company

- protects confidentiality of data by appropriate measures, particularly against unauthorized access,
- protects against accidental destruction, damage so as to keep information and processing accurate and complete
- ensures availability so as to enable the authorized user to access the required information and keep the related tools available.

The IT system and network of the company and our partners is protected against computer-aided fraud, computer viruses, computer intrusions, espionage, sabotage, and acts of vandalism, fire, and flood. The operator also provides for the security through server-level and application-level security measures. The software applied at the company has data protection impact assessment certificate.

You are informed that electronic messages are transferred through an encrypted channel to the e-mail address you have provided to us (previously sent by you).

The company logs the systems in order to record any and all security deviations and be able to present evidence for security breach. System monitoring also allows us to control the efficiency of the applied measures.

In the course of determining and applying the data security measures, the Company considers the state of technological development available at that time and the conditions of data processing. Among multiple potential choices, the Company shall choose the one that provides the highest level of protection of personal data unless this would require disproportionate efforts. The Company shall enforce these requirements even in the lack of data processors.

personal data of others cannot be requested.

During the term of provision, the right to access shall also be due to the person authorized in writing by data subject, whereas **after** the lapse of the term of provision the same shall also be due to the person authorized by private document providing full evidence.

Right to rectification: Data subject has the right to request the Company to rectify his or her inaccurate personal data without undue delay; furthermore, to have his or her incomplete personal data completed by, among other instruments, supplementary statements. Change in ID data shall be validated.

The Company requests any changes in data be submitted without undue delay within 8 days.

Right to erasure: The data subject has the right to request from the Company the erasure of his/her personal data without undue delay, and the Company shall delete such personal data of the data subject without undue delay on any of the reasons listed in paragraph 1 Article 17 in the GDPR.

The right to erase personal data shall not be applicable to processing data in the Privacy Policy in connection with tasks performed for compliance with legal regulation under point b paragraph 3 article 17 in the GDPR

The Company shall restrict data processing until the request for erasure is judged.

Right of withdrawal: The withdrawal of the consent does not affect the lawfulness of the data management based on consent prior to the withdrawal

Right to restrict data management: If data management is restricted, personal data with the exception of storage may be managed only with the consent of the person concerned or for the submission, validation or protection of legal claims or for the protection of the rights of other natural or legal persons, or for the public interest of the European Union or of a Member State

Data subject shall be entitled to request the Company to restrict the processing of data in the cases below:

- if the person concerned disputes the accuracy of the personal data, the restriction concerns the period of time which allows for checking the accuracy of the personal data;
- if the data management is unlawful and the person concerned opposes the deletion of the data and, instead, he/she requests the restriction of their use;
- the data manager no longer needs the personal data for data processing, but the person concerned requires them to submit, enforce or protect legal claims.

Right to object against data processing: In the event of the right of objection is exercised, the Company is not entitled to manage the data any longer unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims

Under paragraph 1 Article 21 in the GDPR it shall not apply to the extent of data managements based upon the consent, contract, and legal liability.

The results of interest-balancing test are available at the seat of the Company.

Right to data portability: The data subject shall have the right to receive the data concerning him or her, which he or she has provided to the Company,

- in a structured, commonly used and machine-readable format, and
- have the right to transmit those data to another controller, and
- the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible
- however, this right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority

This right of the data subject may be exercised if processing is carried out by automated means, and the company processes the data based on consent of the data subject or pursuant to a contract.

7. THE RIGHTS YOU MAY ENFORCE IN CONNECTION WITH DATA MANAGEMENT

Right of data subject	What data management activities does it apply to?
Access – information	<ul style="list-style-type: none"> • Data processed in connection with contacting • Data processed in connection with patients involved in clinical trial • Data processed in connection with healthcare employees involved in clinical trial
Access – copy	<ul style="list-style-type: none"> • Data processed in connection with contacting • Data processed in connection with patients involved in clinical trial • Data processed in connection with healthcare employees involved in clinical trial
Rectification	<ul style="list-style-type: none"> • Data processed in connection with contacting • Data processed in connection with patients involved in clinical trial • Data processed in connection with healthcare employees involved in clinical trial
Erasure	<ul style="list-style-type: none"> • Data processed in connection with contacting
Restriction of data management	<ul style="list-style-type: none"> • Data processed in connection with contacting • Data processed in connection with patients involved in clinical trial • Data processed in connection with healthcare employees involved in clinical trial
Objection against data management	<ul style="list-style-type: none"> • Data processed in connection with contacting
Right of data portability	The right of data portability so not apply to the extent of data in the Privacy Policy, because no automated data processing occurs.

The above rights may be exercised by submitting your request allowing your identification to the Company. Exercise of right of data subjects below 16 requires the procedure by and consent of his or her legal representative.

Administration deadline for requests is 25 days, but the deadline for requests concerning the right of objection shall be 15 days. The Controller informs the data subject on the result of the judgement of request. If in the course of exercise of right there is a doubt whether the request has been submitted by the data subject itself, then the Company may request additional information to protect its own lawful data management and data subject.

The company, whose request resulted in restriction of data management, shall inform on the release of restriction of data management in advance.

The Company shall inform all recipients about all corrections, cancellations, or restrictions of the data management to whom he/she communicated personal data unless this proves impossible or would require disproportionate efforts. At the request of the concerned person, the data manager shall inform him/her about the above actions and causes thereof.

Right to turn to supervising authority and to court:

If you have questions regarding the data managed by the Company or think that the data manager has violated his right to protect your personal data during the data management, then please primarily contact the Company's data protection officer.

Should your attempt to seek remedy have failed, then data subject may submit a claim to the National Authority for Data Protection and Freedom of Information as per Article 77 in the GDPR and Article 52 of the Information Act. In addition, Data subject has the right to turn to court under Article 22 in Information Act, Article 79 in the GDPR, and Section III in Volume II in the Act V of 2013 on the Civil Code of Hungary.

National Authority for Data Protection and Freedom of Information:

Seat: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1374 Budapest, Pf. 603.

Telephone: +36 (1) 391-1400

e-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu