

Isobar Budapest Zrt. Privacy Notice

Last updated: [10.10.2019]

Isobar Budapest Zrt. (registered office: 1027 Budapest, Kacsá u. 15-23., corporate registration number: 01-10-044680) is a member of the Dentsu Aegis Network global media group. On the other hand, the „iProspect” brand is a brand belonging to Isobar Budapest Zrt.

We provide assistance in marketing and advertisement development in a printed form, in mails, e-mails or at websites. We believe that responsible data management helps the development of enterprises and enables to work out a strong relationship between the given brand and the consumers. We, as an enterprise, are dedicated towards respecting and protecting the privacy of the individuals who get in touch with us. We are committed to managing and processing personal data at all times in a transparent manner, in compliance with the relevant laws governing personality rights and data protection.

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us.

Please note that Isobar Budapest Zrt. is the controller of the personal data that you disclose to us with regard to this website.

This Privacy Notice explains the following:

1. Information we may collect
2. How we use this information
3. How we store your personal data
4. How we secure your personal data
5. Information sharing and disclosure
6. International and group company transfers
7. Your rights
8. Our responsibility for website links
9. Updates
10. How to contact us

In the “**Supplementary Information**” section of this Privacy Notice, we explain what is meant by “**personal data**” and other terms used in this notice.

1. Information we may collect

The type of information we collect will depend on the circumstances and the service you are using. Generally speaking, we will collect information relating to you and/or your use of our services in the following ways:

- **Information relating to your use of the website**

We collect information about how you use our website. This includes information relating to the pages you visit on our website, the services or information your search for and the links and content you choose to access. We may also use the personal information you provide through your use of our website to provide you with relevant content and to inform our marketing strategy. This type of activity is known as “profiling” – using automated means to process your personal data to analyse or

predict your personal preferences, interest or behaviours. You can object to profiling (see section 7 of this Notice, below).

- **Technical data**

We collect information about the device(s) you use to access our site. This includes collecting unique mobile device ID or the internet protocol (IP) address online identifiers, which are numbers that can uniquely identify a specific computer or other network device on the internet. This information is linked to a cookie ID, which we receive and process. You may find more information on the cookies we use and the purposes for which we use them on our separate [Cookie Notice](#).

- **Contact data**

We collect your contact data in order to respond to your enquiry. The personal data that we collect cover your name, e-mail address, company name and place of residence.

- **Children**

We do not actively seek to collect information about children aged 16 or under. If you have any concerns about your child's privacy in relation to our services, or if you believe that your child may have entered personal data onto our website, please contact us at privacy.hungary@dentsuaegis.com. We will delete such information from our records within a reasonable time.

2. How we use this information

Except where required by law, we use the personal data you provide for the following purposes:

- to deliver the specific information or services you have requested;
- to enable the download of our content;
- respond to your requests and feedback; and
- analyse and/or improve our services.

Under data protection law we are required to advise you on the legal basis for processing your personal data. For the most part, the processing of your personal information is based either on a) our legitimate interests related to us providing you services you have requested or otherwise your customer relationship with us, or b) your consent, where requested.

In the table below we set out further information about the purposes for which we use your personal data and the legal basis we rely on for its use. Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Purpose/Activity	Types of personal data that may be processed	Lawful basis for processing including basis of legitimate interest
To send you information about our services: · To send you information which you have requested e.g. publications in accordance with your specified preferences	(a) Name (b) Email address (c) Company (d) Location	Where you have requested information from us, such as publications or event invitations, we send such communications based on your consent.
To improve and develop our website: We conduct statistical	(a) Technical (example: IP)(b) Usage	Necessary for our legitimate interest (to define types of clients for our

analysis on your usage of the website e.g. to enable us to improve our website, offer new features and material etc.

services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

To deliver relevant content to you and measure or understand the effectiveness of the content we serve to you.

- (a) Name (b) Email address
- (c) Company (d) Location
- (e) Usage (f) Marketing and communications (g) Technical (example: IP)

Necessary for our legitimate interests (to study how clients use our service and engage with our content. To develop our service, to grow our business and to inform our marketing strategy).

To respond to any enquiries or feedback that you send us · To update you with any changes to our terms and conditions/other policies

- (a) Name (b) Email address
- (c) Company (d) Location

It is in our legitimate interest to respond to communications that you send to us, inform you of relevant information in relation to the services that we provide and utilise your information to improve our business.

To reach out with information on our products and services relevant to your needs

- (a) Name (b) Email address
- (c) Location (d) Usage

It is our legitimate interests to work out which of our products or services may interest you and tell you about them.

To share information with our service providers.

- (a) Name (b) Email address
- (c) Usage (d) Marketing and communications (e) Technical (example: IP)

It is our legitimate business interest to share your data with trusted third parties who provide us with services relevant to the provision of our website.

To share information within the Dentsu Aegis Network group.

- (a) Name (b) Email address
- (c) Location (d) Usage

As Dentsu Aegis Network operates as a global operating media company, it is our legitimate business interest to share your data within the Dentsu Aegis Network group in order to manage our business effectively and provide our products and services.

To share information with other third parties, such as regulator and law enforcement agencies

- (a) Name (b) Email address
- (c) Location (d) Usage (e) Technical (example: IP)

We share your data as necessary for compliance with any legal obligation to which we are subject or in order to satisfy our legitimate business interests.

3. How long we will keep your information

We will keep your personal data for as long as is necessary for the relevant service, in accordance with our legal obligations. After this time, your personal data will either be securely deleted or anonymised so that it can be used for analytical purposes. You may request further information via the contact details given in this Privacy Notice.

4. How we secure your information

We maintain appropriate organisational and technological safeguards to help protect against unauthorised use, access to or accidental loss, alteration or destruction of personal data. We also seek to ensure our service providers do the same.

5. Information Sharing and Disclosure

Information shared with our third-party service providers

We use a number of third parties to perform various business functions on our behalf, e.g. hosting our online services and customer relationship management. We will only disclose the information necessary to enable these third parties to perform their services. Our service providers are contracted to comply with our instructions and we require that they do not use your personal data for their own business purpose.

Information shared with other parties

Where required or permitted by law, personal data may be provided to others, such as regulator and law enforcement agencies, for example in response to a court order or a subpoena, or in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent or take action regarding illegal activities, and as otherwise required by law.

We do not sell or rent any personal data about you to any third party.

6. International and group company transfers

We, as a controller, inform you that our company is a member of the Dentsu Aegis Network Company Group, which is a globally operating media group covering several companies. Therefore, we may from time to time disclose your personal data within our group of companies. Access will always be controlled on a need-to-know basis, and only provided where it is necessary to provide you with requested services or to allow us to perform any necessary or legitimate functions. Some of our group companies are located outside the European Union, but we always ensure the security of such disclosures and transfers in accordance with the applicable privacy and data protection laws.

We will only transfer your personal data outside the EU, where we are satisfied that adequate levels of protection are in place to protect the integrity and security of any information being processed and compliance with applicable privacy and data protection laws. These measures may include the use of standard contractual/data protection clauses adopted by the European Commission and where transfers are to the United States of America, the EU-US Privacy Shield, Swiss-US Privacy Shield or your consent. Where we transfer personal data between our group companies we have covered these transfers by entering into standard contractual clauses adopted by the European Commission.

You may request further information on the measures used for such transfers via the contact details given in this Privacy Notice.

7. Your rights

- **Object to our processing** of your personal data where we are relying on legitimate interest (or those of a third-party), and you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have a right to object where we are processing your personal data for the purposes of direct marketing or profiling. You can object at any time and we shall stop processing the information you have objected to, unless we can show compelling legitimate grounds to continue that processing.
- **Access your personal data.** If you make this kind of request and we hold personal data about you. We are required to provide you with information on it, including a description and copy of the personal data and why we are processing it. We will require you to prove your identity before granting access to your personal data. We will process your request within the timeframe required under the relevant law.

- **Request the transfer of your personal data.** We will provide to you or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note, this right applies to the personal data you have provided to us; and if we use your personal data on the basis of consent or where we used the information to perform a contract with you.
- **Request erasure (deletion) of your personal data.** You have a right to ask us to delete or remove your data where you have successfully exercised your right to object (see above), or where we are required to erase your personal data to comply with local law. Please note, we may be required to retain certain information by law and/or for our own legitimate business purpose. But when we do so, we will inform you.
- **Request correction** or updating of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request the restriction of our processing** of your personal data in some situations. If you request this, we can continue to store your personal data but are restricted from processing it while the restriction is in place.
- **Withdraw your consent.** Where you have provided your consent to our processing of your personal data you can withdraw your consent at any time. If you do withdraw consent, that will not affect the lawfulness of what we have done with your personal data before you withdrew consent.
- **Make a Complaint.** You can exercise your rights specified in this Privacy Notice with regard to data processing by way of a written request sent by mail to the address of our registered office, or electronically to the dpo@dentsuaegis.com address.

You may seek legal remedy if we fail to provide the information in writing within one month calculated from submitting the written request for information, if the personal data are not erased, limited or rectified within one month and if we fail to indicate the reasons for refusal.

If you do not agree with the decision taken by the controller in the subject matter of the request, you may institute court proceedings against the decision under section 23 of the Info Act, within 30 days of being notified of the decision.

Complaints may be submitted to, and legal remedy is available at the Nemzeti Adatvédelmi és Információszabadság Hatóság - National Authority for Data Protection and Freedom of Information - (hereinafter: NAIH).

Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information)

Registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Website address: <http://www.naih.hu>,

E-mail address: ugyfelszolgalat@naih.hu

You may turn to court against the decision of NAIH regarding the complaint.

You may turn to court directly against the Controller if, in your opinion, the Controller processes the personal data disclosed to it by violating the provisions set forth in the laws regarding personal data processing or the provisions set forth in the mandatory legal act of the European Union. At your discretion, the court competent at your permanent or temporary residence shall proceed in the matter.

Please note that in the event where you exercise your above rights and any question arises about your personal identity, we may request you to provide data that enable us to ascertain your personal identity.

8. Our responsibility for website links

This Privacy Notice is limited to the personal data collected by Isobar Budapest Zrt. Our site contains links to external websites, e.g. Google, YouTube. If you follow these links, you should use these sites in conjunction with their applicable user and privacy notices as their data practices fall outside the scope of this Privacy Notice. Further, we can have no responsibility for or control over the information collected by any third-party website and we cannot be responsible for the protection and privacy of any information which you may provide on such websites.

9. Updates

This Privacy Notice may be updated from time to time to reflect changes in law, best practice or a change in our practices regarding the treatment of personal data. The date of the most recent revision will appear at the top of this page. If you do not agree to the changes, please do not continue to use our services and please refrain from sharing your personal data with us. You should check this notice frequently for updates.

10. Contact us

If you have any questions about this Privacy Notice, our approach to privacy or you would like to exercise any of the rights mentioned in this Privacy Notice you can contact our Data Protection Officer in any of the following ways:

Address: Data Protection Officer, Dentsu Aegis Network, Regent's Place, 10 Triton Street, London, NW1 3BF

Telephone: (+44) (0) 207 070 7700

Email: dpo@dentsuaegis.com

Details of Isobar Budapest Zrt., as controller:

Seat: HU – 1027 Budapest, Kacsá utca 15-23.

Telephone: +36 1 411 2200

E-mail: privacy.hungary@dentuaegis.com

This Privacy Notice has been made in the English and Hungarian languages, and in the case of deviation between the two versions, the Hungarian version shall apply.

“SUPPLEMENTARY INFORMATION”

In this Supplementary Information section, we explain some of terminology used in this Privacy Notice.

“data controller” – the person or company that controls the purposes and means of processing personal data.

"personal data" – any information that relates to you (or from which you can be identified).

“processing” – means doing anything with data. For example, it includes collecting it, holding it, disclosing it and deleting it.

“profiling” - using automated means to process personal data in order to work out certain things about people, like analysing or predicting their performance at work, reliability, economic situation, personal preferences, interests, behaviour, location or movements.

"transfer" – sending personal information outside the European Economic Area (e.g. by storing it on equipment located outside the European Economic Area), or allowing someone from outside the European Economic Area to access the personal information.