



PRIVACY NOTICE OF BLACK CELL HUNGARY ZRT. AS DATA CONTROLLER ON ITS DATA PROCESSING ACTIVITIES

DOCUMENT OWNER:	Zsolt Baranya
REVIEWER:	Tünde Lendvai
APPROVER:	Béla Droppa
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1 Purpose of the Document

Black Cell Hungary Ltd. (registered office: 1027 Budapest, Fekete Sas Street 2.-; company register number: 01-10-143552; tax number: 32966363-2-41; authorized representative: Dr. Németh Szabolcs, Droppa Béla, Griffiths Dániel board members), as the data controller (hereinafter referred to as the "controller" or "Black Cell"), is committed to protecting the personal data of its customers, business partners, employees and natural persons who have contact with the controller and shall take all organisational and technical measures necessary to ensure the security of the personal data of the persons concerned in the processing activities.

The purpose of this Privacy Notice is to ensure that the controller complies with the information obligations set out in Articles 12, 13 and 14 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the GDPR or General Data Protection Regulation). Record the data processing activities carried out by the controller and its customers, partners or other natural persons who have contact with the controller, and, in addition to the information provided in relation to those activities, explain the rights of the data subjects.

2 Data processing in relation to the controller's websites

The personal data processed include, but are not limited to name, company name, telephone number, IP address, ID, date of registration, email address, location, information about the use of our websites and social networking sites, communications with the controller.

The processing is based on a contract, voluntary consent, or legitimate interest in the business relationship of the parties concerned. Consent to processing based on voluntary consent may be withdrawn at any time or the data subject may exercise his or her right to access, rectify, restrict, or to data erasure.

We process the data for business contact, sending newsletters, organizing professional events, applying for jobs, statistical and marketing analysis, marketing and remarketing purposes, system testing, using customer satisfaction surveys, and to help us maintain and improve our websites. The processing of personal data may involve profiling by the controller, which in all cases will only be carried out with the consent of the data subject.

The data will be processed by the controller until the withdrawal of the data subject's consent or until the expiry of the legal deadline, or in the case of a job advertisement, until the advertisement is closed or until the data subject's consent is withdrawn.

The data shall be processed only for the purposes for which they are intended, under controlled conditions and only by those who need to have access to them for the performance of their tasks. The controller also requires its processors to implement the high level of protection measures detailed below, which it implements itself in the course of the processing.

2.1 Data processing for sending newsletters

Persons concerned:	natural persons who subscribe to receive newsletters https://blackcell.io/ website and sub-sites of the website.
Legal basis for processing personal data:	In accordance with Article 6(1)(a) of the GDPR, the consent of the natural persons concerned to the processing.
Scope of the data processed:	- The name and, - e-mail address of the individuals concerned.
Duration of data processing:	The controller processes personal data until the data subject's consent is withdrawn. The withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
Purpose of the processing:	To communicate news about products and services available in the portfolio of the data controller, to inform the data subject.
Data processor:	The Data Controller uses the services of Intuit Inc., a data processor registered in the United States of America, for the purpose of using the Mailchimp mailing platform in the data management process for sending newsletters. For more information on the data processing activities carried out by Intuit Inc., please consult the data processing notice available on the company's website (https://www.intuit.com/privacy/). The data

	controller reserves the right to involve additional processors in the future, which will be informed by means of an amendment to this privacy notice.
Data transfer to a third country:	Data subjects' data are transferred to a third country (United States of America) based on an adequacy decision of EU.

2.2 Data processing for contact via controller's websites

Persons concerned:	Natural persons who fill in the dedicated contact forms with their personal data on https://blackcell.io/ website and sub-pages of the website and send them to the controller.
Legal basis for processing personal data:	In accordance with Article 6(1)(a) of the GDPR, the consent of the natural persons concerned to the processing.
Scope of the data processed:	- The name, - job position, - e-mail address, - the name of the place of work (employer), and - additional personal data provided by the data subject in free text in the message field.
Duration of data processing:	The controller processes personal data until the data subject's consent is withdrawn. The withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
Purpose of the processing:	Providing information about the products and services available in the portfolio of the data controller, informing the data subject about issues that arise individually.

Data processor:	The data controller does not use the services of a data processor in the course of data processing. However, the Data Controller reserves the right to involve additional processors in the data processing in the future, which will be communicated to the data subject by means of an amendment to this privacy notice.
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2.3 Data processing in relation to an online job application

Persons concerned:	A natural person who submits an electronic job application to the controller.
Legal basis for processing personal data:	In accordance with Article 6(1)(a) of the GDPR, the consent of the natural persons concerned to the processing.
Scope of the data processed:	- The name, - photo, - date and place of birth, - contact details (e-mail address, telephone number, postal address), - professional experience and competences, - information on educational qualifications and language skills, and - any personal data that the data subject brings to the attention of the controller in connection with his or her job application
Duration of data processing:	Personal data brought to the attention of the controller by the data subject are processed primarily until the data subject's consent is withdrawn, or until the purpose of the processing ceases, such as the filling of a vacancy or the termination of the vacancy. If the data subject gives his or her specific consent, his or her submitted job application may be kept for

	a further 6 months after the closure of the vacancy.
Purpose of the processing:	The filling of job applications advertised by the data controller by the natural persons applying for the job who are best suited in terms of their competences and qualifications.
Data processor:	The data controller may use the services of the following processors for the processing of job applications: - Law firm (Újváry Zsolt Law Office, 19/A Prielle Kornélia Street, Ground Floor 2, 1117 Budapest) - Accountancy Office (Benefit Consulting Ltd., 67 Vörösmarty Street, 5th Floor, 1064 Budapest) - Microsoft Ireland Ltd. (file storage service) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
Access to personal data:	Only natural persons who have an employment or other legal employment relationship with the data controller and are involved in the administration or assessment of job applications, as well as data processors as described in this section, are entitled to access personal data. Transfers may only be made in relation to the processors indicated in this point and in compliance with a legal obligation or a decision of a public authority.

2.4 Data processing related to online deal registration

Persons concerned:	Natural persons who fill in dedicated contact forms with their personal data on the https://blackcell.io/ website and subpages of the website and send them to the controller, or who otherwise disclose their contact personal data to
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	the controller and request an offer for a license or hardware of a type specified by the controller.
Legal basis for processing personal data:	In accordance with Article 6(1)(a) of the GDPR, the consent of the natural persons concerned to the processing.
Scope of the data processed:	- The name, - where applicable, position title, - e-mail address, - name of workplace (employer), and - any other personal data provided by the data subject in free text in the message field.
Duration of data processing:	The controller processes personal data until the data subject's consent is withdrawn. The withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
Purpose of the processing:	Refine commercial offers and participate in the deal registration process, which ensures that potential buyer partners are offered favorable pricing structures by the data controller's supplier partners.
Data processor:	The data controller uses the services of the following data processors in the deal registration data management process. The Data Controller reserves the right to involve additional processors in the future, which will be notified to the data subjects by amending this Privacy Policy. - Clico Hungary Ltd. (Location: 1134 Budapest, Dévai street 26-28.; company registration number: 01-0276058; e-mail: info@clico.hu); - Palo Alto Networks Ltd. (Location: 3000 Tannery Way, Santa Clara, CA 95054; e-mail: info@paloaltonetworks.com); - IBM Magyarországi Ltd. (Location: 1117 Budapest, Neumann János street 1.; company registration number: 01-09-060028);

	- Sophos Ltd. (Location: 1117 Budapest, Alíz street 1.; company registration number: 01-09-988725; e-mail: info@sophos.com); - Exclusive Networks Hungary Ltd. (Location: 2038 Sósút, Rákóczi street 14.; company registration number: 13-09-204542, e-mail: sales@veracomp.hu); - HRP Europe Ltd. (Location: 1033 Budapest, Huszti road 34.; company registration number: 01-09-663082; e-mail: info@hrp.hu); - Arrow ECS Számítástechnikai Ltd. (Location: 1117 Budapest, Neumann János street 1/E. 1. em.; company registration number: 01-09-698831; e-mail: info.ecs.hu@arrow.com); - Acunetix Ltd. (Location: 101 Finsbury Pavement, Moorgate, London, EC2A 1RS United Kingdom; e-mail: support@acunetix.com); - Tenable Inc. (Location: 7021 Columbia Gateway Drive Suite 500 Columbia, MD 21046, USA, e-mail: sales@tenable.com); - Yellow Cube Kft., (Location: 8400 Ajka, Kosztolányi Dezső street 14/A., e-mail: sales@yellowcube.hu); - Splunk Inc. (Location: 270 Brannan Street, San Francisco, CA 94107, e-mail: sales@splunk.com); - Rapid7 LLC. (Location: 120 Causeway Street Suite 400. Boston, MA 02114, United States of America, e-mail: info@rapid7.com); - Teramind Inc. (Location: 194595 Biscayne Blvd, Suite 606 Aventura, FL 33180, United States of America, e-mail: support@teramind.com); The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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2.5 Handling of “cookies”

The Data Controller uses "cookies" (hereinafter referred to as "cookies") on its websites under this Privacy Notice. Cookies are files that store identifying information on the terminal equipment of

natural persons who download websites. In accordance with the provisions of Directive 2002/58/EC of the European Parliament and of the Council concerning the processing of personal data and the protection of privacy in the electronic communications sector (hereinafter "Directive on privacy and electronic communications"), users must be informed in advance of the purpose of the use of cookies. The use of cookies is subject to the consent of the user, and it should therefore be possible for the user to refuse the installation of cookies on terminal equipment.

Persons concerned:	Natural persons visiting the website of the data controller (https://blackcell.io/).
Legal basis for processing personal data:	The processing of data for statistical and marketing purposes, to provide better user experience and to ensure the functioning of the websites is in the legitimate interest of the data controller, and the data subjects consent to the processing of their data.
Scope of the data processed:	The IP address of the person concerned.
Duration of data processing:	Depending on the type of cookies: - necessary cookies: 11 months, - analytical cookies: 1 year, - advertisement cookies: 5 months/ session duration/ never.
Purpose of the processing:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR. Identification and differentiation of visitors, i.e. users, identification of sessions, storage of data provided in sessions, prevention of loss of stored data, and tracking of visitors and web analytics measurements in order to enable the controller to provide a personalized service to visitors
Data processor:	- Intuit Inc. (2632 Marine Way Mountain View, CA 94043, United States of America) - Google Ireland Ltd. (Gordon House, Barrow Street, Dublin 4, Ireland)

	The Data Controller reserves the right to involve additional processors in the data processing process in the future, which will be communicated to the data subject by amending this Privacy Notice.
Data transfer to a third country:	Data subjects' data are transferred to a third country (United States of America).

The Controller uses the following types of cookies on its websites:

Cookies that enable websites to operate

Their use is necessary for the proper functioning of the website, for the navigation and use of its functions. By using the site, the visitor acknowledges their use.

Functional cookies

These cookies are used to make the website more convenient to use, including allowing the site to remember the user's preferences (e.g., language settings) and information previously provided on the website.

Cookies for statistical purposes

Statistical cookies are used by the website to collect information about the use of the site, such as the length of different sessions or which parts of the website visitors clicked on. The Data Controller processes this data in order to improve its services and websites. These statistics do not allow visitors to be identified personally.

Cookies used for the website <https://blackcell.io/>:

The types, exact names, providers, and lifespans of the cookies used on the website may vary due to updates in the underlying technologies. A complete, accurate, and up-to-date list of cookies, along with their detailed descriptions, is available in real time via the Cookie disclaimer (Cookie Banner) on our website, where Users can modify or withdraw their consent at any time.

3 Data processing in connection with offers and purchase orders

During the sales activities related to the products and services offered by the data controller, besides the data of potential customers and partners, the data controller may also process personal data of their representatives and persons designated to contact them. To ensure transparency, this Privacy Notice outline the details of data processing for data subjects as required by the GDPR.

3.1 Data processing in connection with offers

Persons concerned:	Persons authorized to represent organizations wishing to enter into a contract with the
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	controller in a partner or client capacity, or other contact persons entrusted with requesting a quotation from the controller.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR.
Scope of the data processed:	- The name, - job position, - phone number, - e-mail address of the person concerned.
Duration of data processing:	The controller shall store the personal data of the data subject until the conclusion of the contract or the withdrawal from the offer.
Purpose of the processing:	Preparing and sending offers to customers according to the needs and specifications provided by customers.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - Pipedrive OÜ (Mustamäe tee 3a Tallinn 10615, Estonia) The Data Controller reserves the right to involve additional processors in the data processing process in the future, which will be notified to the data subjects by amending this Privacy Notice.

3.2 Data processing in relation to purchase orders

Persons concerned:	Natural persons who wish to enter into a contract with the data controller in the capacity of a partner or customer, who are authorized to process orders or who have other contacts entrusted with the processing of orders.
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Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR.
Scope of the data processed:	- The name, - job title, - phone number, - e-mail address of the person concerned.
Duration of data processing:	The data controller stores the personal data of the interested party until the conclusion of the contract or the withdrawal from the offer.
Purpose of the processing:	In the case of acceptance of offers made by the data controller, the conclusion and performance of a contract on the terms set out in the offer
Data processor:	The data controller uses the following data processor for data processing: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

4 Data processing in connection with participation in public procurement procedure

In the course of its business activities, the data controller enters into public procurement procedures in order to sell its products and services to the public sector and to organizations subject to public procurement and tendering procedures. During these activities, it is obliged to use systems for the storage of personal data and for the management of contacts, which also involve the processing of personal data. To provide these organizations with detailed information on its data management activities, the controller describes its data management activities in this privacy notice.

4.1 Data processing in connection with participation in a public procurement procedure

Persons concerned:	Employees or other persons employed by Black Cell in connection with a public procurement procedure, as well as contact persons of subcontracting partner organizations and natural persons involved in the management of the public procurement procedure.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) of the GDPR and, in the case of certain data, the fulfilment of a legal obligation to which the controller is subject pursuant to Article 6(1)(c) of the GDPR.
Scope of the data processed:	- Name, - job title, - e-mail address, - FAKSZ details - - contact details of the AK and AT in the procurement procedure - particulars of the evidence of formal qualifications attesting professional competence - details of the subcontractor's (capacity provider's) manager, contact person and other employees.
Duration of data processing:	For a period determined by the DKR system, up to a maximum of 8 years.
Purpose of the processing:	The successful launch of Black Cell in a public procurement procedure.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd.

	- Prime Minister's Office (1357 Budapest, P.O.box 6.) - Új Világ Nonprofit Szolgáltató Ltd. (1077 Budapest, Kéthly Anna square 1.) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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4.2 Data management for centralized public procurement (DKÜ Public Procurement System)

Persons concerned:	In the course of the controller's business activities, the controller maintains continuous contact with its partners, customers and persons authorized to represent them and their designated contact persons in order to conclude and perform contracts. In order to provide its customers and partners with detailed information on its data management activities, the controller describes its data management activities in this privacy statement.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) of the GDPR and, in the case of certain data, the fulfilment of a legal obligation to which the controller is subject pursuant to Article 6(1)(c) of the GDPR.
Scope of the data processed:	- The name, - e-mail address, - name and details of employer of the data subject is processed.
Duration of data processing:	For a period determined by the DKR system, up to a maximum of 8 years.

Purpose of the processing:	The successful launch of Black Cell in a public procurement procedure.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - Digitális Kormányzati Ügynökség LLC. - Prime Minister's Office The Data Controller reserves the right to involve additional processors in the data processing process in the future, which it will inform the data subjects about by amending this Privacy Notice.

5 Data processing in connection with contracts and agreements

In the course of the controller's business activities, the controller maintains continuous contact with its partners, customers and persons authorized to represent them and their designated contact persons in order to conclude and perform contracts. In order to provide its customers and partners with detailed information on its data management activities, the controller describes its data management activities in this privacy statement.

5.1 Processing of data relating to conclusion and termination of contracts

Persons concerned:	Persons authorized to manage and maintain contact with companies that have entered into a contract with the controller as a partner or customer.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	- The name, - job title, - phone number, - e-mail address, - and sign of the person concerned.

Duration of data processing:	The data will be processed during the contract period.
Purpose of the processing:	The conclusion and duration of the contract between Black Cell and the partner or customer.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - Microsoft Ireland Ltd. Law firm (Újváry Zsolt Law Office, 19/A Prielle Kornélia Street, Ground Floor 2, 1117 Budapest) - Accountancy Office (Benefit Consulting Ltd., 67 Vörösmarty Street, 5th Floor, 1064 Budapest) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

6 Data processing in related to the performance of contracts

In the course of the controller's business activities, the controller maintains continuous contact with its partners, customers and persons authorized to represent them and their designated contact persons in the performance of contracts. In order to provide its customers and partners with detailed information on its data management activities, the controller describes its data management activities in this privacy statement.

6.1 Data processing related to integration and configuration

Persons concerned:	Persons using the company's electronic information systems, in addition to the employees of the companies contracted to act as a customer by the controller.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	- The name, - position,

	- email address, - phone number, - username, - password of the person concerned.
Duration of data processing:	The above data will be processed during the contract period.
Purpose of the processing:	Execution of the contract and integration and configuration tasks.
Data processor:	The data controller uses the following data processor for data processing: - Microsoft Ireland Ltd. - Atlassian B.V. (350 Bush Street, Floor 13, San Francisco, CA 94104; Data Residency: EEA) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

6.2 Service management data processing

Persons concerned:	Persons using the company's electronic information systems, in addition to the employees of the companies contracted to act as a customer by the controller.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	- The name, - job title, - phone number, - e-mail address, - username,

	- device activity data, - and data contained in log events of the person concerned.
Duration of data processing:	The data will be processed during the contract period.
Purpose of the processing:	Performing the contract and service management and other tasks related to the operation of the systems.
Data processor:	The data controller uses the following data processors for data processing: - Invicti Security Corp. (Location: 1000 N Lamar Blvd Suite 300 Austin, TX 78703, United States) - AT&T (Location: 208 S. Akard St. Dallas, TX 75202, United States of America) - CyberArk Software Inc. (Locations: 60 Wells Avenue Newton, MA 02459, United States of America) - Checkmarx Ltd. (Location: Ramat Gan, Amot Atrium Tower, 2 Jabotinsky Street HQ, Israel) - Acronis International GmbH (Location: Rheinweg 9, 8200 Schaffhausen, Switzerland) - Microsoft Ireland Ltd. - Palo Alto Networks Ltd. (Location: 3000 Tannery Way, Santa Clara, CA 95054; e-mail address: info@paloaltonetworks.com); - IBM Magyarországi Ltd. (Location: 1117 Budapest, Neumann János street 1.; company registration number: 01-09-060028); - Sophos Kft. (Location: 1117 Budapest, Alíz street 1.; company registration

	number: 01-09-988725; e-mail address: info@sophos.com); - Rapid7 LLC. (Location: 120 Causeway Street Suite 400 Boston, MA 02114, United States of America) - Ruckus Networks (Location: 1100 CommScope Place SE, Hickory, NC, 28602, United States of America) - Splunk Inc. (Location: 270 Brannan Street, San Francisco, California, United States of America) - Recorded Future, Inc. (Location: 363 Highland Avenue, Somerville, MA 02144, United States of America) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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6.3 Transport and implementation-related data processing

Persons concerned:	Persons using the company's electronic information systems, in addition to the employees of the companies contracted to act as a customer by the controller.
Legal basis for processing personal data:	Necessary for the performance of a contract pursuant to Article 6(1)(b) of the GDPR.
Scope of the data processed:	- The name, - title, - telephone number, - email address, - username, - device activity data, - log file data of the person concerned.

Duration of data processing:	The above data will be processed during the contract period.
Purpose of the processing:	Performing the contract and service management and other tasks related to the operation of the systems.
Data processor:	The data controller uses the following data processors for data processing: - Invicti Security Corp (Location: 1000 N Lamar Blvd Suite 300 Austin, TX 78703, United States) - AT&T (Location: 208 S. Akard St. Dallas, TX 75202, United States of America) - CyberArk Software Inc. (Location: 60 Wells Avenue Newton, MA 02459, United States of America) - Checkmarx Ltd. (Location: Ramat Gan, Amot Atrium Tower, 2 Jabotinsky Street HQ, Israel) - Acronis International GmbH (Location: Rheinweg 9, 8200 Schaffhausen, Switzerland) - Microsoft Ireland Ltd. - Palo Alto Networks Ltd. (Location: 3000 Tannery Way, Santa Clara, CA 95054; e-mail address: info@paloaltonetworks.com); - IBM Magyarországi Ltd. (Location: 1117 Budapest, Neumann János street 1.; company registration number: 01-09-060028); - Sophos Ltd. (Location: 1117 Budapest, Alíz street 1.; company registration number: 01-09-988725; e-mail address: info@sophos.com);

	- Rapid7 LLC. (Location: 120 Causeway Street Suite 400 Boston, MA 02114, United States of America) - Ruckus Networks (Location: 1100 CommScope Place SE, Hickory, NC, 28602, United States of America) - Splunk Inc., (Location: 270 Brannan Street, San Francisco, California, United States of America) - Recorded Future, Inc. (Location: 363 Highland Avenue, Somerville, MA 02144, United States of America) - TNT Express Hungary Kft. (Location: 1185 Budapest II. Logistics Centre - Office Building, BUD International Airport Building 283). - Atlassian B.V. (350 Bush Street, Floor 13 San Francisco, CA 94104; Data Residency: EEA) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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6.4 Data processing related to the Outsourced Data Protection Officer (DPO) or Information Security Officer (IBF) service

Persons concerned:	Representatives, contact persons and, in certain cases, their employees, other contractors, subcontractors and agents and their employees who have a contractual relationship with the data controller for the provision of the Data Protection Officer (DPO) or Information Security Officer (IBF) service.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR.

Scope of the data processed:	The person concerned: - Name, - title, - telephone number, - email address, - (the ID of) a certificate or degree required by law to fulfill the duties of the position, - contracts and other agreements and regulations, if they contain data that can be used to identify a natural person.
Duration of data processing:	Until the end of the outsourced DPO or IBF service, during the term of the contractual relationship.
Purpose of the processing:	The controller carries out activities on behalf of the client to whom it has contracted and, where appropriate, represents the client before a public authority.
Data processor:	The data controller uses the following data processor for data processing: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

6.5 Data management in relation to complaint handling

Persons concerned:	Representatives of partners or customers who have a contractual relationship with the data controller or natural persons appointed by them to act as their contact persons.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR.

Scope of the data processed:	The persons concerned: - Name - phone number - e-mail address and, - voluntarily provided personal data that may be related to the content of the complaint.
Duration of data processing:	During the term of the contractual relationship and, in the event of termination, during the complaint handling period.
Purpose of the processing:	The complaint concerns the remedying of a problem with the performance of a contract or other contractual obligation and the fulfilment of the contract.
Data processor:	The data controller uses the following data processor for data processing: - Microsoft Ireland Ltd. If the problem identified in the complaint concerns a product or service that the controller sells but does not provide, the personal data identified in the complaint may be transferred to the manufacturer of the product or the provider of the service in order to remedy the complaint, provided that the complaint can only be remedied based on this information. The Data Controller reserves the right to involve additional processors in the data management process in the future, which will be communicated to the data subjects by means of an amendment to this Privacy Notice.

7 Processing of data related to confirmations of performance, invoicing and other performance

The data controller may process personal data of representatives of partners, suppliers, and customers, as well as of persons designated to act as contact persons, in connection with the issuing

of invoices and performance confirmations, payment for goods and services. In order to provide data subjects with adequate and transparent information on the details of the processing, the controller describes its activities in relation to the processing in this privacy notice.

7.1 Processing of data related to confirmations of performance and invoicing

Persons concerned:	Contact persons and natural persons authorized to represent customers and partners who purchase products from the data controller and use the services of the data controller in connection with invoicing and confirmation of performance.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR.
Scope of the data processed:	The - Name - phone number and - e-mail address of the persons concerned.
Duration of data processing:	The data controller shall keep the data contained in the accounting records for at least 8 years after the expiry of the period referred to in Article 169 (1) of Act C of 2000 on Accounting.
Purpose of the processing:	To issue invoices to customers or partners and carry out other operations related to payments.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - Benefit Consulting Ltd. (registered office: 67 Vörösmarty Street, 5th Floor, 1064 Budapest) - Pipedrive OÜ (seat: Mustamäe tee 3a Tallinn 10615, Estonia)

	- Számlaközpont Llc. (registered office at 15 Nagyváradi street, 7625 Pécs, Hungary) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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7.2 Processing of late payments and payments notices

Persons concerned:	Contact persons and natural persons authorized to represent customers and partners who purchase products from the data controller and use the services of the data controller in connection with invoicing and confirmation of performance.
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(f) of the GDPR.
Scope of the data processed:	The - Name - e-mail address of the persons concerned.
Duration of data processing:	Until performance or until the limitation period for claims under Act V of 2013 on the Civil Code (5 years)
Purpose of the processing:	Settlement of invoices to customers or partners, acceleration of late payments
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - Számlaközpont Llc. (head office: 7625 Pécs, Nagyváradi street 15.)

	The Data Controller reserves the right to involve additional data processors in the data processing process in the future, which will be informed to the data subjects by amending this Data Processing Notice.
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8 Data processing related to the establishment and duration of an employment relationship

8.1 Processing of data relating to job interviews and the recruitment process

In the event of a successful application for a job advertisement, the data controller will conduct an interview with the applicant to verify the applicant's competences, communication, and other skills. During the job interview, the data controller's staff involved in the recruitment process will contact the data subject in person or by video call to ask questions relating to the data necessary to fill the vacancy, the answers to which may involve the processing of personal data. The job interview, if conducted through the Microsoft Teams application, will be recorded by the data controller for easy retrieval and comparability of candidates. The recording will include the candidate's image and voice, as well as his/her answers to questions and any questions that may contain personal data.

Persons concerned:	Natural persons who apply for a job advertisement of the controller and who are called for an interview by the controller
Legal basis for processing personal data:	The consent of the natural persons concerned to the processing in accordance with Article 6(1)(a) of the GDPR.
Scope of the data processed:	The person concerned: - Name, - photo, - voice, - date and place of birth, - contact details (e-mail address, telephone number, postal address), - professional experience and competences, - information on education and language skills, and

	- any personal data that the data subject brings to the attention of the controller in connection with his or her job application.
Duration of data processing:	The controller shall process the personal data brought to the controller's attention by the data subject primarily until the data subject's consent is withdrawn, or until the purpose of the processing ceases to exist, i.e. until the job application is filled or the vacancy is no longer advertised. If the data subject withdraws his/her application after the interview, the controller shall immediately delete all personal data relating to him/her, unless the data subject has given his/her explicit consent to keep his/her application for a further 6 months after the closure of the vacancy. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
Purpose of the processing:	To fill job vacancy advertised by the data controller from among the natural persons applying for the job who are best qualified in terms of their competences and qualifications.
Data processor:	The data controller may use the services of the following processors for the processing of job applications: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

8.2 Data processing in relation to employee introduction

Persons concerned:	Employee of the controller
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Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR regarding the mandatory elements. The consent of the natural persons concerned to the processing in accordance with Article 6(1)(a) of the GDPR regarding additional introduction information.
Scope of the data processed:	The person concerned: - Name, (mandatory) - photo, (mandatory) - position (mandatory) - professional experience and competences, (consent) - information on education and language skills, and (consent) - any personal data that the data subject brings to the attention of the controller in connection with his or her introduction. (consent)
Duration of data processing:	The employee introduction (with the mandatory elements) will be presented after the probationary period ends, and data processing will continue only for as long as the employment relationship remains in effect. The controller shall process personal data brought to the controller's attention by the data subject, in particular until the data subject's consent is withdrawn. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal of consent.
Purpose of the processing:	Mandatory elements of employee introduction include the name, position, and photo, which serve to introduce the employee to colleagues and are in the controller's legitimate interest to ensure physical security measures related to office work and access. Without clear

	identification and recognition of employees, there is a risk that unauthorized individuals could gain access to the data controller's premises under their names or identity (personification). Considering that the employees of the controller typically perform their duties through teleworking, it is necessary to introduce new colleagues joining the organisation by electronic means. To this end, new colleagues are given the opportunity to publish a written introduction to facilitate their integration into the organisation.
Data processor:	The data controller may use the services of the following processors for the processing of employee introduction: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

8.3 Presentation of a certificate of good conduct

The employer requests that the person concerned present a certificate of good conduct for the purpose of gaining insight into the individual's background to operate its certified ISMS in accordance with ISO27001:2022 Annex A.6.1 control (screening). HR reviews the contents of the document but does not make a copy of it. If the certificate of good conduct does not contain any record relevant to the prohibition from performing certain professions or any other cause for concern, Black Cell HR prepares a statement containing the document's identifying information, which is retained until the duration of the employment relationship.

Persons concerned:	Employee of the controller
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	The person concerned: - name,

	- signature, -request identification number, -document identification number, -place and date of issuance.
Duration of data processing:	The controller shall process personal data for the duration of the employment relationship.
Purpose of the processing:	For employees in management and confidant positions, particularly in cases where the employee has access to the client's infrastructure and data assets, are required to verify their clean criminal record.
Data processor:	The data controller may use the services of the following processors for the processing of statements: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

8.4 Verification of identity for entering into an employment contract

Persons concerned:	Employee of the controller
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	The person concerned: - name, - signature, -ID number.
Duration of data processing:	The controller shall process personal data for the duration of the employment relationship.

Purpose of the processing:	Prior to entering an employment contract, the organization must verify the employees' identity in accordance with ISO27001:2022 Annex A6.1 control. For this purpose, the data controller requests that the employee present an identification document (containing a photograph) for visual inspection and checking validity date. The ID number and signature is part of the employment contract.
Data processor:	The data controller may use the services of the following processors for the processing of job contracts: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

8.5 Presentation of proof of professional experience or qualifications

To ensure the quality of the work, the controller verifies the authenticity of the documents certifying the skills and experience acquired by the employee concerned. After the degree is presented, the employer issues a statement that includes the employee's name, signature, the name of the issuing institution, the date of issuance, the level and name of the degree, and the degree's identification number.

Persons concerned:	Employee of the controller
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	The person concerned: - name, - signature - certificate number, - issuing institution's identifier number,

	- degree level, - name of qualification, - place and date of issuance - information on other professional education and language skills,
Duration of data processing:	The controller shall process personal data only for as long as the employment relationship remains in effect.
Purpose of the processing:	Verification of the authenticity of a degree and professional qualification. Verification of the professional and language skills that an employee claimed to possess during a job interview or the hiring process, or that the employee acquired during the course of the employment relationship.
Data processor:	The data controller may use the services of the following processors for the processing of statements on professional experience: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

8.6 Internal CVs

The employer requires the employee to prepare an internal CV (using the information contained in the documents certifying professional qualifications), to be used for tenders and applications. To perform certain tasks and provide outsourced expert services, legal provisions require that individuals hold specific qualifications (such as 17/2025. (VII.24.) EM regulation regarding list of acceptable professional qualifications and accredited international qualifications), and the employer (controller) must provide proof of these to the client.

Persons concerned:	Employee of the controller
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Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	The person concerned: - name, - degree type, level and issuing institution name - name of qualification or certification and its validity number, - place and date of issuance - information on language skills (language and level),
Duration of data processing:	The controller shall process personal data only for as long as the employment relationship remains in effect.
Purpose of the processing:	Certifying professional qualifications of employees on tenders and applications
Data processor:	The data controller may use the services of the following processors for the processing of internal CV: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

8.7 Entering into an employment contract and ongoing agreements

Persons concerned:	Employee of the controller
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	The person concerned: - Name,

	- mother name, - date of birth and place, - citizenship, - address, - tax ID number, - bank account number, - TAJ number, - photo, - phone number, - signature. Employment-related data, - job title, - start and end dates of employment, - type of employment (full-time/part-time), - terms and conditions specified in the employment contract, - annual leave and sick leave and additional leave (number and cause) management, - wage, - home office conditions (residence, authorized HO addresses)
Duration of data processing:	The controller shall process personal data: - tax documents: 5 years, - accounting documents: 8 years, - data supporting pension eligibility (archived): until the relevant pension insurance requirements are met, typically over several decades.
Purpose of the processing:	Preparing certified payrolls, managing leave entitlement.

Data processor:	The data controller may use the services of the following processors: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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8.8 Payroll processing

Persons concerned:	Employee of the controller
Legal basis for processing personal data:	The legitimate interest of the controller or a third party pursuant to Article 6(1)(f) GDPR.
Scope of the data processed:	The person concerned: - Name, - mother name, - date of birth and place, - citizenship, - address, - tax ID number, - bank account number, - TAJ number, Employment-related data, - job title, - start and end dates of employment, - type of employment (full-time/part-time), - terms and conditions specified in the employment contract, - absence, annual leave, sick leave and additional leave (number and cause),

	- Smoking status (on a voluntary basis) for requesting additional leave, - standby time and time tracking data, - wage, - medical certificate for employees unable to work for sick leave management (TAJ, mother name, address, date of sick leave, cause of the inability to work and the patient's condition regarding: outpatient, inpatient, hospital care, doctors' name, signature and stamp), Factors that qualify for tax relief, such as: - age-based tax relief, - allowance based on family status, - number of children living in a household, - medical condition qualifying for tax relief (BNO),
Duration of data processing:	The controller shall process personal data: - payroll core data: following the termination of employment, until all legal obligations have been fulfilled, - tax documents: 5 years, - accounting documents: 8 years, - data supporting pension eligibility (archived): until the relevant pension insurance requirements are met, typically over several decades.
Purpose of the processing:	Preparing certified payrolls, managing leave entitlement.
Data processor:	The data controller may use the services of the following processors: - Microsoft Ireland Ltd. - Benefit Consulting Ltd.

	The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
Sub-processor:	Sub processor of Benefit Consulting Ltd.: - Soft Consulting Hungary Zrt. (payroll software)

9 Data processing related to communication and contract

The data controller shall conduct its activities in continuous contact with its partners, customers and the natural persons appointed to maintain contact with and represent them in the performance of their duties in connection with offers, contracts and their performance. In order to ensure transparency of the data management activities related to the contact, the controller provides the following information to the data subjects.

9.1 Data processing in relation to mail sent or received by postal or parcel services and communications by e-mail

The data controller may contact its partners and customers and the natural persons representing them and designated for contact purposes in connection with invoicing, confirmation of performance, product delivery or return by email, using traditional mail or parcel services. These contact methods involve the processing of certain personal data, the processing of which is described in this section.

Persons concerned:	Natural persons appointed as contact persons by customers or partners who have a business relationship with the controller.
Legal basis for processing personal data:	The consent of the natural persons concerned to the processing in accordance with Article 6(1)(a) of the GDPR.
Scope of the data processed:	The - Name, - job position, - e-mail address, - postal code and address

	- phone number of the concerned natural persons.
Duration of data processing:	The controller shall process the contact details until the offer is issued or, in the case of a contractual relationship, during the contractual relationship.
Purpose of the processing:	In the case of the supply of products and services to customers and partners, the issuing of offers, the delivery of the contracted product, licences or service and support activities, and the provision of general advice in response to requests.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - TNT Express Hungary Ltd. (1185 Budapest II. Logistics Centre - Office Building, BUD International Airport Building 283.) - Magyar Posta LLC (1138 Budapest, Dunavirág str. 2-6.) The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be informed by amending this Privacy Notice.

9.2 Data management related to the use of Microsoft Teams

The data controller uses the Microsoft Teams platform as the primary method of communication with its partners, customers or their designated natural persons. The data of the natural persons involved in the communication are processed by the employees of the data controller participating in the conversation. The video or voice call meeting conducted through the Microsoft Teams application is a joint data controller between Black Cell and Microsoft Corporation, whose European operations are overseen for data protection purposes by Microsoft Ireland Operations Limited - One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.

Persons concerned:	Natural persons participating in a video or voice call meeting.
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Legal basis for processing personal data:	In accordance with Recitals 44 and 47 of the GDPR, the legitimate interest of the controller or of a third party under Article 6(1)(f) of the GDPR.
Scope of the data processed:	Information collected by the data controller through the Microsoft Teams application about the use of the application's features and communications, such as the date and time of the communication and the users involved in the communication.
Duration of data processing:	The data controller shall process the personal data until the end of the enforcement period pursuant to Act V of 2013 on the Civil Code, but no later than the end of the 5th calendar year following the termination of the legal relationship between the parties.
Purpose of the processing:	Delivering business collaboration digitally, making the application work more efficiently and providing the best user experience for stakeholders.
Data processor:	Microsoft Ireland Ltd. For privacy issues related to the use of the Microsoft Teams application, please contact Microsoft Corporation using the form provided.

9.3 Social network sites of the Data Controller

The Facebook page of the Data Controller

The data controller displays data subjects' data on Facebook in a public view, so the scope of the data processed depends on the settings of the data subject. The data controller may see the data subject's data on the Facebook page if the data subject follows the page, likes (or otherwise reacts) to the page, comments, likes (or otherwise reacts) to photos, or posts, writes a recommendation, a review of the page, posts or uploads a photo, GIF, video to the page, writes a private message to the data controller. The Facebook Privacy Policy is available on [this website](#) operated by Facebook Inc.

Persons concerned:	Natural persons visiting the data controllers' Facebook page.
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Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	The Facebook page of the persons concerned: - Name - Content of their posts.
Duration of data processing:	Until the deletion of the Facebook page of the data controller, in other cases until the voluntary deletion of the activity of the data subject.
Purpose of the processing:	The data controller maintains the social networking site for information (communication) and marketing purposes.
Data processor:	Meta Platforms Ireland Ltd. (4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland)

The LinkedIn page of the Data Controller

The data controller displays the data provided by the data subject on LinkedIn in a public view, so the scope of the data processed depends on the settings of the data subject. The data controller may see the data subject's data on LinkedIn if the data subject follows the page, likes (or otherwise reacts) to the page, comments, likes (or otherwise reacts) to photos, or posts, writes a recommendation or review of the page, posts or uploads a photo, GIF, video to the page, or sends a private message to the data controller. The LinkedIn Privacy Policy is available on [this website](#) operated by LinkedIn Inc.

Persons concerned:	Natural persons visiting the data controllers' LinkedIn page.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	Data provided by the data subject on the LinkedIn community site: - Name, - Education, - Name of previous and current employer, - Community activity (e.g. posts, likes, other reactions in the form of emoji, etc.)

Duration of data processing:	Until the deletion of the LinkedIn page of the data controller, in other cases until the voluntary deletion of the activity of the data subject.
Purpose of the processing:	The data controller maintains the social networking site for information (communication) and marketing purposes.
Data processor:	LinkedIn Ireland Unlimited Company (LinkedIn Ireland, Wilton Pl, Dublin, Ireland)

The YouTube channel of the Data Controller

The data controller displays the data provided by the data subject on YouTube in a public view, so the scope of the data processed depends on the settings of the data subject. The data controller may see the data subject's data on YouTube when the data subject subscribes to the page, likes the page, comments, likes videos. YouTube's privacy policy is available on the following [website](#) operated by Google Inc.

Persons concerned:	Natural persons visiting the data controllers' YouTube page.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	The name provided by the data subject at the YouTube page.
Duration of data processing:	Until the deletion of the YouTube page of the data controller, in other cases until the voluntary deletion of the activity of the data subject.
Purpose of the processing:	The data controller maintains the social networking site for information (communication) and marketing purposes.
Data processor:	A Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland)

The X (former Twitter) page of the Data Controller

The data controller displays the data provided by the data subject on X in a public view, so the scope of the data processed depends on the settings of the data subject. The data controller may see the data subject's data in the X feed when the data subject follows the page, likes (or otherwise reacts by

emoji) the page, comments, likes (or otherwise reacts by emoji) the videos. X's privacy policy can be found on the following [page](#).

Persons concerned:	Natural persons visiting the data controllers' Twitter page.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	The name provided by the data subject at the X page.
Duration of data processing:	Until the deletion of the X page of the data controller, in other cases until the voluntary deletion of the activity of the data subject.
Purpose of the processing:	The data controller maintains the social networking site for information (communication) and marketing purposes.
Data processor:	X Corp. (San Francisco, CA / Nevada, USA)

The GitHub page of the Data Controller

The data controller displays the data of the data subject on GitHub in a public view, so the scope of the data processed depends on the settings of the data subject. The data controller may see the data subject's data on GitHub when the data subject follows the site, visits the site. GitHub's privacy notice is available on the following website.

Persons concerned:	Natural persons visiting the data controllers' GitHub page.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	The data provided on the data subject's GitHub page and the activity on the GitHub page.
Duration of data processing:	Until the deletion of the GitHub page of the data controller, in other cases until the voluntary deletion of the activity of the data subject.
Purpose of the processing:	The data controller maintains a GitHub page for the purpose of publishing information

	(communication) and certain solutions it develops.
Data processor:	GitHub Inc (88 Colin P Kelly Junior Street San Francisco, CA 94107, United States of America)

10 Data processing in connection with events and education

The data controller periodically holds public events for its customers, partners and, in some cases, any interested parties, where, in addition to the presentation of its products and services, demonstrations and other events related to the establishment of contacts take place. In addition, the controller also holds educational sessions, where natural persons who voluntarily sign up to participate in the training provided by the controller, provide certain of their personal data in order to participate in the training. In order to enable data subjects to be aware of the controller's activities in relation to its processing, the controller describes its processing activities in this notice.

10.1 Event-related data management

Persons concerned:	Natural persons attending events organized by the controller.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	- Name, - title, - telephone number, - email address, - signature of the person concerned.
Duration of data processing:	The data controller will process the data of the data subjects until the event is carried out.
Purpose of the processing:	The processing of data is necessary for the successful organization of the event.
Data processor:	The data controller uses the following data processor for data processing: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data

	management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.
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10.1.1 Processing of data related to ticketed events

Persons concerned:	Natural persons attending events organized by the controller.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
Scope of the data processed:	- Name, - title, - telephone number, - email address, - signature of the person concerned.
Duration of data processing:	The data controller will process the data of the data subjects until the event is carried out.
Purpose of the processing:	The processing of data is necessary for the successful organization of the event.
Data processor:	The data controller uses the following data processor for data processing: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data management process in the future, which will be communicated to the data subjects by amending this Privacy Notice.

10.1.2 Education related data controlling

Persons concerned:	Natural persons participating in education and advanced training courses organized by the controller.
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Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) GDPR. In some cases, compliance with a legal obligation on the controller under Article 6(1)(c) GDPR.
Scope of the data processed:	The persons concerned: - Name - natural person identification data, - educational identification number, - email address, - details about the highest level of education, - foreign language skills, - data relating to qualifications, - data related to payment obligations.
Duration of data processing:	The data is stored by the data processor for 5 years.
Purpose of the processing:	Conducting education sessions and making the necessary communications.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. - IQSOFT – EduTech Magyarország Ltd. (registered office: 1139 Budapest, Váci road 91.) The Data Controller reserves the right to involve additional data processors in the data processing process in the future, which will be notified to the data subjects by amending this Privacy Notice.

10.1.3 Training for management and responsible for the security of the electronic information system in accordance with 17/2025 (July 24) EM decree

Persons concerned:	Natural persons who apply for the advanced training courses organized by the controller.
Legal basis for processing personal data:	Consent of the data subject pursuant to Article 6(1)(a) GDPR. In some cases, necessary for the performance of a contract pursuant to Article 6(1)(b) GDPR.
Scope of the data processed:	The persons concerned: - Name - email address, - employer's name.
Duration of data processing:	Deleted immediately upon receiving notification from the adult education institution regarding the signing of the contract, but no later than the next business day.
Purpose of the processing:	Organising education sessions with adult education institution, administering contract and making the necessary communications.
Data processor:	The data controller uses the following data processors for data processing: - Microsoft Ireland Ltd. The Data Controller reserves the right to involve additional data processors in the data processing process in the future, which will be notified to the data subjects by amending this Privacy Notice.
Data transfer:	The data is transferred solely for the purpose of conducting the training:

	ALEF Distribution Ltd. (registered office: 1132 Budapest, Váci street 30. floor 3. e-mail: dpo@alef.com Data residency: EEA)
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11 Provision of enforcement

In order to provide the information required by the GDPR in relation to the exercise of the rights of the natural persons concerned, the controller sets out in this section of the privacy notice all the information that may be necessary for the data subjects to exercise their rights. In addition, this chapter also deals with the data controller's processing of claims.

11.1 Data processing in related to legal claims

Persons concerned:	Natural persons who have any legal relationship with the controller.
Legal basis for processing personal data:	The legitimate interest of the controller according to Article 6(1)(f) GDPR.
Scope of the data processed:	The data processed are personal data necessary for the establishment and exercise of legal claims, in particular, but not limited to, official communications (by e-mail and post).
Duration of data processing:	The data controller shall process the personal data until the end of the enforcement period pursuant to Act V of 2013 on the Civil Code, but no later than the end of the 5th calendar year following the termination of the legal relationship between the parties.
Purpose of the processing:	Ensure the successful assertion of legal claims and defense in litigation or administrative proceedings.
Data processor:	The Data Controller does not use the services of a data processor in the data management process related to legal claims. The Data Controller reserves the right to involve additional processors in the future, in particular individual lawyers or law firms, in the data processing process, which will be communicated

	to the data subject by means of an amendment to this privacy notice.
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11.2 Rights in relation to data processing

The data subject shall be entitled to exercise the rights provided for in Articles 15 to 22 and 34 of the General Data Protection Regulation in relation to the processing of personal data, in particular, but not limited to, the rights of access, rectification, erasure, restriction of processing and objection, through the Data Protection Officer in accordance with this privacy notice.

Data Protection Officer (DPO)	Zsolt Baranya
E-mail address of DPO	dpo@blackcell.io
Postal address of DPO	1027 Budapest, Fekete Sas Street 2.

The DPO is obliged in all cases to consider a request for information or legal action from the data subject within one month and to inform the data subject of the decision or action that was taken on the request.

The natural person concerned may report the data processing activities of the controller to the designated supervisory authority pursuant to Article 51/A of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Infotv.) and Article 57(1) of the General Data Protection Regulation. In Hungary, the supervisory authority is the National Authority for Data Protection and Freedom of Information (NAIH- registered office: 1055 Budapest, Falk Miksa str. 9-11.; postal address: 1363 Budapest, postal box.: 9.; Phone: +36 (30) 683-5969 and +36 (30) 549-6838; e-mail: ugyfelszolgalat@naih.hu).

The data subject may take legal action against the controller in the event of a presumed infringement of their rights. The Metropolitan Court of Budapest shall have jurisdiction to hear the case. The lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's choice.

12 Final clauses and other provisions

In the context of the exclusion of liability, the data subject's attention is thereby drawn to the fact that, if the data subject does not provide their own personal data through any of the above-mentioned websites or any other communication channels, the data controller shall not be liable for the processing of such data. It is the data subject's responsibility to obtain the consent of the data subject for the processing of the personal data provided.

In matters not covered by this Privacy Notice, the provisions of the applicable legislation, in particular the General Data Protection Regulation, the ePrivacy Directive, the Infotv., Act CVIII of 2001 on certain

aspects of electronic commerce services and information society services and Act V of 2013 on the Civil Code shall apply.

The controller may amend this notice from time to time, in the light of changes in legislation or developments in data protection jurisprudence. If the modification affects the use of the personal data processed, the user will be informed of the changes by e-mail.

Black Cell reserves the right to draw up a specific data processing notice in Hungarian regarding certain data processing activities within and/or outside the organisation, which does not necessarily form part of this document.

13 Version control

Version	Date	Description of modification	Owner
V1.0	20.03.2023	Original release.	Tamás Dr. Faragó
V2.0	02.07.2025	The changes were implemented to address updates in cookie management and the transition to new partners.	Zsolt Baranya
V3.0	24.09.2026.	Annual review of legal basis for processing personal data and addition of new data processing.	Zsolt Baranya