

PRIVACY POLICY

Employment Data processing of contractual partners

Applicable from 02th 12. 2024.

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		BMS EURASIA Kft. Dentium Europe
Address of data controller:		22. Népfürdő street 1138 Budapest,
Contact details of data controller:	e-mail	europe@dentium.com
	telephone	+36 70 555-4393
	website	https://dentiumeurope.com/
Name of data protection officer (if available)		
Contact details of data protection officer (if available)		

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name, title	Making contracts with company partners and other distributors Performance of the contract	With the consent of the data subject - GDPR Article 6 paragraph 1 letter a)	8+1 years in accordance with Section 169(2) of the Accounting Act.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Perscriptor 1087 Budapest Könyves Kálmán krt. 76. 3/316 accountant, Google Inc 3rd Floor Gordon House D04 E5W5 Barrow Street Dublin, Ireland Google Drive storage, Progen Kft. 1118 Budapest, Homonna utca 8/A. Nagy Machinátor ERP system operator
Recipients	Dentium Co., Ltd. 1F B102, 76, Changnyong-daero 256beon-gil, Yeongtong-gu, Suwon-si, Gyeonggi-do, Republic of Korea, External system administrator, IT service provider, mail system operator, parent company, parent company

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
Dentium Co., Ltd.: Republic of Korea, Adequacy decision (COMMISSION IMPLEMENTING DECISION (EU) 2022/254 of 17 December 2021 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate level of protection of personal data provided by the Republic of Korea under the Personal Data Protection Act, data storage, possible access by the parent company, Google Inc,USA,Privacy Policy and Terms of Use Data Privacy Framework, https://policies.google.com/privacy?hl=hu&fg=1 https://www.dataprivacyframework.gov/list , data storage, possible access by the parent company,

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
No	

Access to data and data security measures:

Restriction of access	Personal data can be accessed by the employee who is required to perform his/her duties, as well as by the management
Data security measures	Entry system Use of security camera Locked document storage Anti-virus on computers Computers, mobile devices are password protected Password protection for applications Rights management

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> – Data Subject shall have the right to request for personal data stored about him/her from the data controller</p> <p><i>Right to data portability</i> - Data Subject shall have the right to receive the personal data concerning him or her in a structured, digital form.</p> <p><i>Right to review of automated individual decision-making</i> - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.</p>

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

PRIVACY POLICY

Employment Processing the data of contact persons

Applicable from 02th 12. 2024.

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Contact details of data controller:	e-mail	europa@dentium.com
	telephone	+36 70 555-4393
	website	https://dentiumeuropa.com/
Name of data protection officer (if available)		
Contact details of data protection officer (if available)		

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Name Position Phone number E-mail address	Communication related to the contact	Legitimate interest - GDPR Article 6 paragraph 1 letter f)	8+1 years in accordance with Section 169(2) of the Accounting Act.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject The employer of the data subject
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Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	Perscriptor 1087 Budapest Könyves Kálmán krt. 76. 3/316 accountant, Vodafone Hungary Telecommunication Zrt. 1112 Budapest, Boldizsár utca 2. Telecommunication service Google Inc 3rd Floor Gordon House D04 E5W5 Barrow Street Dublin, Ireland Google Drive storage, Progen Kft. 1118 Budapest, Homonna utca 8/A. Nagy Machinátor ERP system operator
Recipients	Dentium Co., Ltd. 1F B102, 76, Changnyong-daero 256beon-gil, Yeongtong-gu, Suwon-si, Gyeonggi-do, Republic of Korea, External system administrator, IT service provider, mail system operator, parent company, parent company

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