

DATA PROCESSING NOTICE**on the processing of data of non-staff individuals****CHAPTERS:**

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1. INTRODUCTION

The purpose of this Data Processing Notice is to provide information on the processing of all non-staff individuals (hereinafter: **data subjects**) the personal data of whom have become known to business organisations belonging to the Bonafarm Group, as well as MCS Vágóhíd Zrt., as controllers in connection with the preparation of potential contracts or the performance of existing contracts. This Data Processing Notice shall apply to the processing of personal data that the Controller receives either directly from the data subjects or from other sources (e.g. contracting party).

1. DEFINITIONS

The expression used in this Data Processing Notice shall have the following meanings pursuant to Section 3 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (the Privacy Act) and Article 4 of the General Data Protection Regulation (GDPR):

Bonafarm Group: Bonafarm Zrt. and all business organisations in which it has participating interest, which are owned directly or indirectly by Bonafarm Zrt., which are not regarded as a recognised group of corporations pursuant to Section 3:49 of Act V of 2013 on the Civil Code; the group is not a separate legal entity, has no legal capacity, is not entitled to acquire rights under its own name and is not entitled to assume commitments. The business organisations belonging to Bonafarm Group and MCS Vágóhíd Zrt. as an affiliated company are regarded as a group of undertakings pursuant to Section 37 of the Preamble of GDPR.

data subject: any natural person directly or indirectly identifiable by reference to specific personal data; (Section 3 (1) of the Privacy Act) ; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors (Article 4 (1) of GDPR),

personal data: any information relating to the data subject – including especially any identifier such as name, identification number, location data, online identifier provided by devices, applications and protocols used by the data subject (e.g. IP address, cookie identifiers) or any other identifier (e.g. radio frequency identification /RFID/ tags (Section 30 of the Preamble of GDPR), or factors specific to the physical, physiological, genetic, mental, economic, cultural or

social identity of that natural person, as well as conclusions drawn from the data in regard to the data subject (Section 3(2) of the Privacy Act, Article 4 (1) of GDPR),

controller: a natural or legal person, or organisation without legal personality which alone or jointly with other entities determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or have them executed by a data processor it commissions; (Section 3 (9) of the Privacy Act, Article 4 (7) of GDPR)

processing: any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collection, recording, organisation, structuring, storage, modification, use, retrieval, transferring, disclosure, synchronisation or connection, restriction, blocking, erasure and destruction of data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans); (Section 3 (10) of the Privacy Act, Article 4 (2) of GDPR)

data process: performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data; (Section 3 (17) of the Privacy Act)

data processor: any natural or legal person or organisation without legal personality, public authority, agency or other body processing the data on the grounds of a contract, including contracts concluded pursuant to legislative provisions; which processes personal data on behalf of the controller (Section 3 (18) of the Privacy Act, Article 4 (8) of GDPR)

third party: any natural or legal person, or organisation without legal personality other than the data subject, the data controller or the data processor (Section 3 (22) of the Privacy Act), persons who, under the direct authority of the controller or processor, are authorised to process personal data; (Article 4 (10) of GDPR)

data transfer: ensuring access to the data for a third party; (Section 3 (11) of the Privacy Act)

data deletion: making data unrecognisable in a way that it can never again be restored; (Section 3 (13) of the Privacy Act)

the data subject's objection: a declaration made by the data subject objecting to the processing of their personal data and requesting the termination of data processing, as well as the deletion of the data processed; (Section 3 (8) of the Privacy Act)

3. PURPOSE, LEGAL BASIS, DURATION OF DATA PROCESSING AND THE GROUP OF PROCESSED PERSONAL DATA

The purpose of data processing is the processing of the personal data of non-staff natural persons that the controller becomes aware of during its business activities before contract signing with potential contracting parties, or in connection with the performance of signed contracts or in any other way.

- before contract signing (e.g. during the bidding procedure) for the purpose of contract signing with potential contracting parties,
- for the performance of contracts in relation to existing contracts,
- for the purpose of settlement with the contracting parties after contract performance,
- for the purpose of maintaining contact with the contracting parties.

The legal basis for data processing:

Enforcement of the employer's legitimate interests:

- a) Subsection b) of Section 6 (1) of the Privacy Act; and
- b) Point f) of Article 6 of GDPR.

The Controller has performed the interest assessment test to determine the existence of a legal basis, as a result of which it has been determined that data processing is necessary for the enforcement of the employer's legitimate interests, and the interests related to data processing proportionately restrict the data subjects' personal rights. The Controller's legitimate interest as a legal basis for data processing exists, wherefore personal data affected by this data processing notice can be processed with regard to the provisions of the Privacy Act and point f) of Article 6 of GDPR even without the data subject's consent.

Group of processed personal data:

- the data subject's name,
- name of the entity represented by the data subject or name of the contracting party whose personal data come to the controller's knowledge in relation to an existing business relationship,
- contact details (e-mail address, telephone number, address, etc.)
- personal data that come to the controller's knowledge in connection with the business relations of its potential or contracted partner or in connection with the performance of an existing contract.

Duration of data processing:

The controller shall process the data subjects' personal information until:

- the end of the preparatory process preceding contract signing,
- contract performance is completed,
- the date of settlement related to the performance of the contract,
- the expiration of the time period prescribed by the tax laws for the storage of data included in the accounting documents.

4. ENTITIES ENTITLED TO BE ENGAGED IN DATA PROCESSING AND DATA PROCESS
Controller:

The Controller shall be that business organisation from the list below in relation to which the data subject's personal data are processed in connection with the performance of the existing business relationship or contract.

Company name	Postal address	Company registration No.	e-mail address
Bonafarm Zrt.	1123 Budapest, Alkotás utca 53.	01-10-046467	info@bonafarm.hu
Bonafarm-Bábolna Kft.	2942 Nagyigmánd, Burgert Róbert Agrár-Ipari park 03/25 hrsz.	11-09-012449	info@btakipar.hu
Bóly Zrt.	7754 Bóly, Ady E u 21.	02-10-060048	birosag.iratok@boly.bonafarm.hu
Csányi Pincészet Zrt.	7773 Villány, Ady fasor 2.	02-10-060164	villany@csanyipince.hu
Dalmand Zrt.	211 Dalmand, Felszabadulás u. 42.	17-10-001131	titkarsag@dalmand.bonafarm.hu
Fiorács Kft.	H-2941 Ács, Fő u. 43.	11-09-001646	info@fioracs.bonafarm.hu
BonOffice Kft.	6725 Szeged, Horgosi út 31.	06-09-009010	info@bonoffice.hu

PICK SZEGED Zrt.	6725 Szeged, Szabadkai út 18.	06-10-000065	titkarsag@pick.hu
„MCS” Vágóhid Zrt.	7700 Mohács, Pick Márk út 1.	02-10-060403	mvgahid@gmail.com
Rem-Bó Kft.	Pécs-Reménypuszta, 0224/23hrs.	02-09-068828	birosag.iratok@boly.bonafarm.hu
„AGROINVEST-ORMÁNSÁG 98” Kft.	7754 Bóly, Ady Endre utca 21.	02-09-071113	birosag.iratok@boly.bonafarm.hu
Görcsönyi Agrár Kft.	7775 Kislippó, 18. hrsz.	02-09-067880	birosag.iratok@boly.bonafarm.hu
Véméndi Agrár Kft.	7726 Véménd, Alkotmány u. 2.	02-09-067882	birosag.iratok@boly.bonafarm.hu
Bólyi Agrár Kft.	7754 Bóly, hrsz 2202.	02-09-062278	birosag.iratok@boly.bonafarm.hu
Sole-Mizo Zrt.	6728 Szeged, Budapesti út 6.	06-10-000119	solemizo@solemizo.bonafarm.hu
Agroprodukt Zrt.	8500 Pápa, Szent István út 12.	19-10-500063	titkarsag@agroprodukt.hu
Sertésenyésztő és Hízaló Bt.	8531 Ihász, 0272 hrsz	19-06-000161	titkarsag@agroprodukt.hu
Wildex Kereskedelmi Kft.	8500 Pápa, Szent István u. 12.	19-09-000145	titkarsag@agroprodukt.hu

Data processor:

The Data processor is the entity known by the data subject who is regarded as the data processor pursuant to the contract related to the processing of the data subject's data.

Bonafarm Zrt. (postal address: 1123 Budapest, Alkotás utca 53. B towel 4. floor, e-mail address: info@bonafarm.hu, website: www.bonafarmcsoport.hu), the business organisation providing item data management, IT, purchasing and controlling services

BonOffice Kft. (postal address: 6725 Szeged, Horgosi út 31.; e-mail address: info@bonoffice.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/bonoffice), the business organisation providing accounting services related to the performance of contracts that can be associated with the data subject by the controller.

Bóly Zrt. (postal address: 7754 Bóly, Ady E u 21., email address: birosag.iratok@boly.bonafarm.hu),

a) as Dalmand Zrt. and Bonafarm-Bábolna Takarmány Kft. the business organisation providing:

- goods and services related services
- crop and bait related sales services
- controlling related services

b) as FIORÁCS Kft., the business organisation providing:

- goods and services related services,
- controlling related services

c) as Agroprodukt Kft. the business organisation providing:

- goods and services related services

FIORÁCS Kft. (postal address: 2941 Ács, Fő u. 43., e-mail address: info@fioracs.bonafarm.hu),

a) as Bóly Zrt. és Dalmand Zrt. the business organisation providing pig integration and sales related administration services

b) as Agroprodukt Zrt. the business organisation providing advisement of pig department and pig integration and sales related administration services

Bonafarm-Bábolna Takarmány Kft. (postal address: 2942 Nagyigmánd, Burgert Róbert Agrár-Ipari park 03/25 hrsz., e-mail address: info@btakipar.hu), the business organisation providing logistics services of products and crops

Business Audit Kft. (postal address: 1125 Budapest, Tusnádi utca 6.B., e-mail address: szabocs@gmail.hu), the business organisation providing business audit services;

Reach Media Kft. (postal address: 1036 Budapest, Tímár utca 8/a. 1/1., e-mail address: nagy.attila@reachmedia.hu, website: <http://www.reachmedia.hu>), the business organisation providing data management of the personal data regarding Controller.

Entities entitled to obtain data:

On behalf of the Controller, the chief executive officer / managing director of the data processing company, the persons involved – on the Controller's behalf – in the performance of the contract that can be associated with the data subject; in relation to accounting documents, the employees of BonOffice Kft. engaged in the provision of accounting services.

5. SECURITY OF DATA PROCESSING

The Controller shall protect data with appropriate measures, especially against unauthorised access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction, damage or inaccessibility arising from the modification of the applied technology.

During the processing of data the Controllers shall maintain:

- a) confidentiality: they shall protect the data and provide access to authorised persons only;
- b) completeness: they shall ensure the accuracy and completeness of the data and of the processing method;
- c) availability: they shall ensure access for authorised users to the required data in a timely manner, they shall ensure the availability of such data, and shall fulfil this objective with appropriate tools.

6. RIGHT ENFORCEMENT AND LEGAL REMEDY**6.1. Right enforcement pursuant to the Privacy Act**

Pursuant to the Privacy Act, the data subjects may request from the Controller:

- a) to provide them with information on the processing of their personal data;
- b) to correct their personal data, and
- c) with the exception of data processing ordered by law, to delete their personal data in the manner indicated when the personal data were recorded, or to block these data at the Controller's indicated location.

Upon the data subject's request, the Controller shall provide information on data controlled by him or processed by a data processor he has commissioned, of the sources of data, the purpose, legal basis and duration of data processing, the data processor's name, address and data processing related activities, as well as the legal basis and recipient of data transfer if such activity is pursued. The Controller shall provide the requested information in writing as soon as possible after the request is filed, but not later than within 25 days, in a manner understandable for the general public.

This information shall be provided free of charge if the person requesting the information has not submitted a request to the Controller for the same data in the current year. In all other cases the Controller shall set a fee for this service.

The Data Controller shall **rectify** the personal data if they are deemed inaccurate and accurate personal data are available.

The Controller shall **block** the personal data if so requested by the data subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of the data subject. Blocked data shall be processed only for the purpose which prevented their erasure.

If the accuracy of an item of personal data is contested by the data subject and its accuracy or inaccuracy cannot be ascertained beyond doubt, the data controller shall mark that item for the purpose of referencing.

The Controller shall **delete** the personal data if:

- a) their processing violates the law;
- b) the data subject requests their deletion;
- c) the processed data are incomplete or incorrect – and this situation cannot be lawfully remedied – provided that deletion is not prohibited by law;
- d) the purpose of data processing no longer exists or the legal time limit for storage has expired;
- e) so ordered by court or by the National Authority for Data Protection and Freedom of Information.

If the Controller refuses to comply with the data subject's request for rectification, blocking or erasure, the factual or legal reasons on which the decision for refusing the request for rectification, blocking or erasure is based shall be communicated in writing within twenty-five days from the receipt of the request. Furthermore, the Controller shall inform the data subject of the possibilities for seeking judicial remedy or lodging a complaint with the Authority.

The Controller shall inform about the rectification, blocking, marking or deletion of the data the data subject and all other entities to whom the data were previously transferred for processing purposes. Sending such a notice is not necessary if this does not violate the data subject's legitimate interest related to data processing.

Pursuant to Section 21 of the Privacy Act, the data subject shall have the right to **object** to the processing of data relating to him:

- a) if processing or disclosure is carried out solely for the purpose of meeting the Controller's legal obligation or for enforcing the rights and legitimate interests of the Controller, the recipient or a third party, unless processing is mandated by law;
- b) if personal data are used or transferred for the purposes of direct marketing, public opinion polling or scientific research; and;
- c) in all other cases prescribed by law.

The Controller shall, within the shortest possible time but not later than fifteen days following the submission of the request, assess the objection, decide on its merits and notify the applicant of the decision in writing. If the Controller establishes that the objection is justifiable, it shall terminate data processing – including any further data entry and data transfer –, block the data and notify of the objection and of the measures taken all those entities to whom the personal data concerned was previously transferred and who are obliged to take measures to enforce the right to object.

6.2. Enforcements of legitimate rights pursuant to GDPR

In addition to the above written, pursuant to Article 15 (1) of GDPR, the data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, **access** to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

(2) Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

(3) The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

(4) The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Pursuant to Article 18 (1) of GDPR, the data subject shall have the right to obtain from the Controller **restriction of processing** where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

(2) Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

(3) A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the Controller before the restriction of processing is lifted.

Pursuant to Article 20 (1) of GDPR, the data subject shall have the right to **receive** the personal data concerning him or her, which he or she has provided to a Controller, in a structured, commonly used and machine-readable format and have the right to **transmit those data to another controller** without hindrance from the Controller to which the personal data have been provided, where:

- a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
- b) the processing is carried out by automated means.

(2) In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

6.3. Method of right enforcement

The data subject can exercise his/her data processing rights listed above through an e-mail sent to the Controller's e-mail address from an identifiable e-mail address, or through a letter signed by the data subject and sent to the Controller's official postal address. The data subject's declaration on exercising his or her rights is valid if the relevant data processing purpose is clearly indicated.

6.4. Legal remedy

If the data subject does not agree with the Controller's decision, he or she can lodge an appeal with the court within 30 days from the announcement of the decision.

Legal remedy can be requested from the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

E-mail: ugyfelszolgalat@naih.hu

Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Telephone: +36 (1) 391-1400

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