

Privacy notice

On behalf of Food Autonomy Ltd. as data controller (hereinafter: “data controller”), we give priority to the processing of the statutory rights of our customers and all other natural persons who come into contact with us (hereinafter collectively: “data subject”) in relation to personal data processing: With this in mind, we inform you of the following in relation to the processing of your personal data in this privacy notice.

Controller’s data, contact details:

Company name: Food Autonomy Kft.
Registered office: H-1044 Budapest, Megyeri út 53.
Company registration number: 01-09-308407
Tax number: 26218616-2-41
E-mail: zoltan.sejpes@foodautonomy.org

The controller does not employ a data protection officer.

Data processing

1) Logging IP addresses of website visitors

Purpose of processing	Logging IP addresses of visitors for the purpose of cyber security
Legal basis of processing	Article 6 (1) (f) GDPR: The legitimate interest of the controller and its visitors in cybersecurity
Scope of the data processed	IP addresses of the visitor
Source of data	Data subject
Period of data retention	90 days after recording
Processor	SUPER11 Creative Zrt., Webhost service provider: ININET Internet Kft. (H-1063 Budapest, Szinyei Merse utca 10.; Company registration number: 01- 09-970252)
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	None

2) Contacting our clients and other natural persons who contact us

Purpose of processing	Communicating with the person concerned and responding to their request. Request for quotation, quotation, sale of goods.
Legal basis of processing	If the contract is concluded, performance of the contract [Article 6 (1) (b) GDPR]. If the contract is not concluded [Article 6 (1) (f) GDPR], the legitimate interest of the controller.
Scope of the data processed	Name, e-mail address, telephone number, job title or position, depending on the communication channel As well as any personal information provided by the data subject in his or her

	request or otherwise brought to the attention of the Controller.
Source of data	Data subject
Period of data retention	If the quotation does not result in a contract: 1 year after the quotation is sent. If the quotation results in a contract: 5 years after the termination of the legal relationship.
Processor	SUPER11 Creative Zrt., Webhost service provider: ININET Internet Kft. Microsoft Inc.
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

3) Data processing related to invoicing

Purpose of processing	Sale of own produced goods and related invoicing activities Compliance with the legal obligation to issue and keep invoices and related documents
Legal basis of processing	Performance of the contract [Article 6 (1) (b) GDPR]. Performance of a legal obligation on the controller [Article 6 (1) (c) GDPR - Accounting Act and VAT Act.
Scope of the data processed	Data on the invoice which may contain personal data (name) - the company performs B2B activity
Source of data	Data subject
Period of data retention	8 years after the current year
Processor	Nefrit Extrém Kft. accountant Finadventures Kft. számlázz.hu Microsoft Inc.
Recipients of data transfers	Tax and Customs Authority
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

4) Non-performance of contractual obligations

Purpose of processing	Enforcement of claims in the event of non-performance of contractual obligations
Legal basis of processing	The legitimate interest of the controller [Article 6 (1) (f) GDPR]. Maintaining contact with its contractual

	partner and communication in order to fulfil the contract are the Controller's legitimate interests.
Scope of the data processed	Name, email address, as well as the content of messages exchanged during the contact and technical information about the message.
Source of data	Data subject
Period of data retention	General limitation period (5 years)
Processor	Microsoft Inc.
Recipients of data transfers	Legal representative
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

5) Marketing communication

Purpose of processing	Sending own offers, new product information, success stories and references to those who are interested in the company's products in order to generate direct business
Legal basis of processing	The legitimate interest of the controller related to direct marketing [Article 6 (1) (f) GDPR]. The data subject may object to the processing at any time.
Scope of the data processed	Name, telephone number, e-mail address, position
Source of data	Data subject
Period of data retention	Until an objection notified by the data subject
Processor	Super 11 Creative Zrt. Microsoft Inc.
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

6) Data processing related to job application

Purpose of processing	Carrying out the selection process for the advertised vacancy
Legal basis of processing	The legitimate interest of the controller in recruitment [Article 6 (1) (f) GDPR]. Consent of the data subject [Article 6 (1) (a) GDPR].
Scope of the data processed	Name, e-mail address, telephone number, curriculum vitae and any other personal information provided to the Controller in this scope
Source of data	Data subject

Period of data retention	After selection, the data will only be processed for the purpose of making a further job offer if the data subject has given his or her consent, or stored without consent, as evidence against discrimination, in both cases for a maximum of three (3) years.
Processor	Finadventures Kft., Profession.hu, Jobline.hu Microsoft Inc.
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

7) Processing of contact details of service providers or other legal person partners

Purpose of processing	Conclusion, performance of the contract and contacting during performance of the contract
Legal basis of processing	The Controller's legitimate interest in maintaining contact with its contractual partners and in communicating with them for the performance of the contract [Article 6 (1) (f) GDPR].
Scope of the data processed	Name, contact details: e-mail address, telephone number, company name, position
Source of data	Provided by the contractual partner
Period of data retention	Until the termination of the underlying contract and thereafter within the general limitation period (5 years).
Processor	Lantos Consulting Kft. Arosto OY, Finadventures Kft. ERP system: DEEP Szintézis Informatikai Zrt. Microsoft Inc.
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

8) Data processing related to social media sites

Purpose of processing	Data processing related to social media sites LinkedIn, Facebook, Youtube
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Legal basis of processing	The legitimate interest of the Controller in social media presence (Article 6 (1) (f) GDPR).
Scope of the data processed	The user profile name you provide, the fact of visiting and interacting with our sites and the anonymised statistical analyses aggregated from them.
Source of data	Data subject
Period of data retention	The data is processed for as long as the customer remains a user of the social networking site and interacts with our site.
Processor	Microsoft Inc. Meta Platforms Inc. is the joint data controller for the site analytics service Google LLC
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	- Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active " - Meta Platforms Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000GnywAAC&status=Active - Google LLC is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt000000001L5AAI&status=Active

9) Dispute resolution, legal claims

Purpose of processing	Data processing in relation to disputes and pending litigation is relevant in cases where the retention period under the original legal basis for the processing has expired, and further processing is only necessary because of an ongoing dispute/litigation
Legal basis of processing	The original legal basis for the processing remains the legal basis, only the retention period is extended for personal data relevant to the lawsuit/dispute.
Scope of the data processed	Data depending on the subject of the dispute or litigation
Source of data	Data subject or public authority, at the request of a public authority
Period of data retention	For 1 year after the final settlement of the dispute or litigation (including enforcement proceedings)
Processor	Microsoft Inc.
Recipients of data transfers	Legal representative, competent court, authority
Profiling or automated decision-making	None

Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active
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10) Asserting rights by the data subject

Purpose of processing	Meeting obligations under data protection rules and ensuring accountability.
Legal basis of processing	Performance of a legal obligation on the controller [Article 6 (1) (c) GDPR; Article 5 (2) GDPR and Article 12 GDPR].
Scope of the data processed	Data provided by the data subject in the exercise of his or her rights. For example: name, email address, content of the request, etc.
Source of data	Data subject
Period of data retention	5 years from the date of receipt of the petition
Processor	Microsoft Inc.
Recipients of data transfers	Legal representative
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

11) Photographs of customers, contracted partners

Purpose of processing	Use of portrait photos, advertising material
Legal basis of processing	Consent of the data subject [Article 6 (1) (a) GDPR].
Scope of the data processed	Image of the data subject
Source of data	Data subject
Period of data retention	For the duration of use, but not later than the withdrawal of consent
Processor	SUPER11 Creative Zrt., Photographer Microsoft Inc.
Recipients of data transfers	None
Profiling or automated decision-making	None
Data transfers to third countries	Microsoft Inc. is a registered company in the Data Privacy Framework Program. https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000KzNaAAK&status=Active

Data subjects' rights, remedies

You, as data subject, may at any time request information about the processing of your personal data and access to these data, as well as request the rectification, erasure or withdrawal of your personal data, except for mandatory processing, and exercise your right to data portability, by contacting us at the above contact details. You may object to processing based on legitimate interest at any time.

Upon your request, we will provide you with the requested information without delay, but within one month at the latest, free of charge, unless the request is unfounded or excessive.

Right to information:

Where we process your personal data, we are obliged to provide you with information in accordance with the GDPR, in a clear and understandable form, but at the same time accurately.

The right of access of the data subject:

You have the right to receive feedback from us on whether your personal data is being processed if you request it. If your identity is properly verified and your personal data are being processed, you have the right to be informed of the details of the processing and to receive a copy of your personal data.

Right to rectification:

Any data subject, including you, may request the rectification of personal data that we hold about you which is inaccurate for any reason, or the completion of incomplete data.

Right to erasure:

You have the right to request the erasure of your personal data for one of the following reasons:

the personal data are no longer necessary for the purposes for which they were collected; if you have withdrawn your consent and there is no other legal basis for the processing;
if you object to the processing and we have no other overriding legitimate grounds for processing;
unlawful processing of personal data can be established;
we have another legal obligation to erase the data.

Right to the restriction of processing:

You may request the restriction of the processing of your personal data in the cases set out in the GDPR. For example, to verify the disputed accuracy of personal data or if you request that data that would otherwise be deleted be kept in order to pursue a legal claim. If the processing is restricted, the personal data will only be stored and processed in exceptional cases. You will be informed in advance of the lifting of the restriction on processing.

Right to data portability:

You have the right to receive your personal data from us in a structured, commonly used, machine-readable format and to transfer this data to another data controller. We can fulfil such requests in MS Word or Excel format. You have the right to data portability if the processing is automated and the legal basis for the processing is your consent or the performance of a contract.

Right to objection:

If your personal data are processed for direct marketing purposes, you have the right to object at any time to this processing, including profiling, if it is also related to direct marketing.

If you object to the processing of your personal data for direct marketing purposes, we will not process your data following your objection.

You also have the right to object if the processing is based on legitimate interest for purposes other than direct marketing. In such cases, we will consider complying with the request, depending on whether your rights, or our rights as data controller, take precedence in accordance with Article 21 (1) GDPR.

Right to withdraw consent:

In cases where we process your data on the basis of your consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing that took place before consent was withdrawn.

Procedural rules:

Upon your request it, we will inform you of the action we have taken on your request without undue delay, but in any event within one month of receiving it. If necessary, taking into account the complexity of the application and the number of requests, this deadline may be extended by a further two months. We will inform you of the extension, stating the reasons for the delay, within one month of receiving your request.

If you submit your request to us in any form, we will respond by e-mail unless you request otherwise.

If, for any reason, we do not take action on your request, we will inform you without delay and at the latest within one month of receipt of the request of the reasons for the failure to act, and that you may lodge a complaint with the supervisory authority and exercise your right to judicial remedy.

We will inform any recipient to whom or with whom we have disclosed your personal data of any rectification, erasure or restriction of processing we have carried out, unless this is impossible or involves a disproportionate effort. We will inform you of these recipients on request.

If you believe that your right to information self-determination has been violated, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information at the following contact details.

Mailing address of the National Authority for Data
Protection and Freedom of Information: H-1530
Budapest, Pf.: 5.
Website: <http://naih.hu>

Additionally, you may also initiate legal proceedings:

In case of claims based on GDPR before the Budapest-Capital Regional Court, in the event of a breach of the provisions of the Freedom of Information Act before the competent court in your place of residence or domicile (<https://birosag.hu/ugyfeleknek/birosagok/torvenyszekek>).

Legislation

We process your personal data in accordance with the following legislation:

- 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 Directive 95/46/EC (General Data Protection Regulation or GDPR);
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Freedom of Information Act);
- Act V of 2013 on the Civil Code (Civil Code)