# PRIVACY NOTICE TO OUR EXISTING AND FUTURE PARTNERS AND CONTRACTED COMMERCIAL PARTNERS

#### Details and contact details of the data controller

Data controller: Below are the members of our group. Of the Group members, the data controller in your respect is always the company that you contact or the Group member that you visit. The Data Controller transfers the data processed by it to the other members of the Group. The Group establishes standard rules and provides joint protection for the sake of data security. Each member of the Group is responsible as the Data Controller for the data it processes and, at the same time, undertake to act in accordance with the same rules when processing the data transferred.

- 1., DELTA-TRUCK Járműjavító és Kereskedelmi Korlátolt Felelősségű Társaság (hereinafter: "DELTA-TRUCK"), Data Controller's registered address: 2310 Szigetszentmiklós, Leshegy utca 13., Data Controller's e-mail address: marketing@delta-truck.hu, Data Controller's telephone number: +3624502250, Data Controller's statutory representative: Péter Stefkó, contact person appointed by the Data Controller during data processing: Kálmán Székely
- 2., Viarent Haszonjárművek Magyarországi Korlátolt Felelősségű Társaság (hereinafter: "VIA RENT") Data Controller's registered address: 2310 Szigetszentmiklós, Leshegy utca 13., Data Controller's e-mail address: marketing@viarent.com, Data Controller's telephone number: +3624502250, Data Controller's statutory representative: Péter Stefkó, contact person appointed by the Data Controller during data processing: Kálmán Székely
- 3., DELTA-TRUCK s.r.o. (hereinafter: "DELTA sro") Data Controller's registered address: 821 08 Bratislava, Klincová 35., Slovakia Data Controller's telephone number: +421917093074, Data Controller's statutory representative: Péter Stefkó, contact persons appointed by the Data Controller during data processing: Kálmán Székely and Kristián Valentík

(hereinafter each of DELTA-TRUCK Kft. Viarent Kft. and Delta sro referred to separately as "Data Controller", and together "Data Controllers")

## Our activities. Definitions. Legal basis, purpose and duration of data processing

Of the Data Controller, Delta-truck is involved in the sale, purchase, servicing, repair and parts trade of new and second-hand commercial vehicles and semi-trailers, while the VIA RENT is engaged in the leasing of vehicles and Delta sro carries out all these activities.

The Data Controllers communicate with the trading partners through their contact persons (hereinafter referred to as "Contact Persons") in the course of marketing contacts, giving offers, the conclusion and performance of contracts and complaints handling.

The Contact Persons can be the managing directors, owners, employees or agents of the partners, who are all natural persons.

In all cases, the Contact Person is responsible for that the data provided by him/her are true and correct. The Data Controllers will not verify the data provided. If a contract is made between the Data Controller and the Partner, the information in the Privacy Notice is completed by the rules of data processing governing contracts due to the change of the purpose of data processing from the time the Data Controller makes its individual offer.

#### **Definitions:**

#### Persons:

**Partner:** Any natural person, legal person or organization without legal personality who/which has a contractual relationship or a business relationship with the Data Controller or is interested in any business activity of, any service proposed or any event or programme organized by the Data Controller.

Contact Person: any natural person acting on behalf of a Partner vis-à-vis the Data Controller, irrespective of the scope of his or her power of representation.

**Other Data Subject**: any natural person acting before the Data Controller representing or on behalf of the Partner, regardless of the purpose of communication, in particular, at events, competitions, tests or test drives, trying of vehicles, roadshows or as a vehicle driver in a damage incident.

Visitor: any person who visits the Data Controller's website.

User: any person who confirms to have come to know the data processing policy on the Data Controller's website, provides and of his/her data and/or initiates using a service.

Manufacturer: any legal person that manufactures and distributes commercial vehicles to the Data Controllers. In any case, the Manufacturer is to be understood as the company that produces and distributes the vehicle, which is the subject of the contract of the Partner concerned. A company is also considered as the Manufacturer where it is a company of the Manufacturer established exclusively for the distribution of vehicles produced by the Manufacturer

FORD OTOSAN: Legal entity that is the manufacturer of FORD brand vehicles and also considered as a Manufacturer.

Insurer: a legal person whose business activity is the conclusion of insurance contracts in its name and the performance of the insurance services undertaken in the contract.

Call Centre: an organisational unit of the Group or a contributor engaged by the Data Controller to contact the Partner or User on its behalf for the purpose defined by the Data Controller.

Group: All or each of DELTA-TRUCK Kft., Viarent Kft., Delta Vagyonkezelő Kft. and DELTA-TRUCK s.r.o.

**Authorized Dealer**: any person that has a contract with the Manufacturer and/or FORD OTOSAN for the distribution of vehicles manufactured by them and for after-sales services related to the distribution, and is therefore presents, advertises, offers and sells to third persons the vehicles of the Manufacturer and/or FORD OTOSAN on their behalf.

**Authorised Service**: any person contracted with the Manufacturer for the maintenance and repair of the vehicles manufactured by them, attending to warranty duties and/or distribution of parts and/or after-sales services related to distribution and, therefore, maintain and repair the vehicles manufactured by the Manufacturer for third persons, attends to warranty duties and/or distributes parts and/or provides after-sales services related to distribution on behalf of the Manufacturer and/or FORD OTOSAN.

#### Data:

Natural identification data: name, home address.

**Contact information**: contact person's name, e-mail address, telephone number, Skype address or other contact details made public by him/her on any social platform that is used to represent the Partner.

**Official Personal Identifiers**: identification numbers issued by the competent national authorities, in particular, the passport number, identity card number, number of the official address card and personal identification number, driver licence number or registration certificate number. Where a copy of the personal identifier is made, it will be forwarded to an authority or financial undertaking, which is indicated by (M) in the table.

**Financial data:** bank card number, bank account number and data concerning the bank account and payments to or from the bank account, including the identification numbers of payments.

Criminal Records: Data on the determination of criminal liability, including traffic offences as well;

**Health Data:** data on current or former physical or mental condition, health condition, injury or disability, medical history of medical interventions carried out;

Data necessary to carry out and process partner satisfaction survey: Partner's name, registered address, contact person, account classification, account number, vehicle information (VIN, make, model); vehicle identification number, purchase date and invoice date, data on visits to the service shop (warranty/courtesy process, place of transfer, date of the event, date of billing), contract data (account number); invoicing and payment data (method of payment, date of invoicing);

**Data related to the partner satisfaction survey process:** answers to the questions electronically, on paper or audio recordings made of those, if any, that are given by the Partner or the Contact Person or other data subject about the Vehicle or the services carried out on the Vehicle, or the lack thereof.

Information regarding warranty (guarantee): under a contract concluded between a Data Controller and the Partner: Partner's name, registered address, contact person, account classification, account number vehicle information (VIN, make, model); vehicle identification number, purchase date and invoice date, data on visits to the service shop (warranty/courtesy process, place of transfer, date of the event, date of invoicing), contract data (account number); invoicing and payment data (method of payment, date of invoicing); data concerning the Vehicle mileage, services, tests made during the service and the warranty period and the results thereof, as well as materials installed during the works, including data arising in relation to each claim enforced as listed in this Clause and related correspondence between the Partner, the Data Controller and the Manufacturer.

Information regarding service worlds: service carried out by any of the Data Controllers based on a contract to be concluded or concluded for a service (hereinafter referred to as ...) under the current general terms and conditions, including, in particular, maintenance, repair, roadworthiness test of vehicles: Partner's name, registered address, contact person, account classification, account number vehicle information (VIN, make, model); vehicle identification number, purchase date and invoice date, data on visits to the service shop (warranty/courtesy process, place of transfer, date of event, date of invoicing), contract data (account number); invoicing and payment data (method of payment, date of invoicing); data concerning the Vehicle mileage, services, tests made during the service and the results thereof, as well as materials installed during the works, as well as data concerning the work phases, including data arising in relation to each claim enforced as listed in this Clause and related correspondence between the Partner, the Data Controller and the Manufacturer.

## Distinction of data in the event of a refusal of consent to data processing:

**Data Marked Bold:** if you do not provide the data in the table marked bold, the Data Controller cannot ensure the service related to the data processing. The absence of such data can be an obstacle to the conclusion of contracts or the performance of services. If the Data Processor plays an intermediary

role in relation to the performance of its service (typically, insurance, financing brokerage, damage settlement, entering in data into the administrative), the lack of data service can be an obstacle to the fulfilment of the intermediation.

**Data Marked Other Than Bold:** This data can be provided depending on your consent or judgement. The lack of providing this information does not prevent the performance of the service, but it is possible that the Data Controller will not be able to offer you a personalized service or a service that suits you best, or can provide the services in a limited way.

## Principles of data processing by the Data Processor:

- 1. We process personal data lawfully and fairly and transparently for the data subject.
- 2. We keep the privacy notice accessible to all on all our websites, in all our applications and, in the case of contacting us in any other way, before providing the data.
- 3. Acceptance of the Privacy Notice a,the mark (marking the appropriate checkbox) confirms that the data was provided; the checkmark and/or downloading the application verify getting acquainted with the privacy notice and is considered as consent to data processing;

b, The privacy notice is continuously available printed on our premises, printed at the events we organize, in printed form at our traders and for sending by electronic mail.

In summary: Data processing can take place only if the Partner or the data subject, other data subject or Visitor grants voluntary, specific informed and unambiguous consent to the processing of personal data concerning the natural person by means of a clear confirmation deed, e.g. in writing, including by electronic means.

- 4. Personal data collected by the Data Controller may only be processed for a specific, explicit and legitimate purpose and shall not be processed in any manner incompatible with these objectives, respectively, they shall be stored in a form that allows identification of data subjects no longer than necessary to achieve the purpose of processing the personal data.
- 5. In carrying out their work, the staff of the Data Controller ensures that no unauthorised persons can access personal data, further, that the storage and placing of personal data are configured in a manner to prevent access, knowing, modification or destruction by any unauthorized persons.

  Use manual:

Below you will find a table. In the first column of the table, locate the **entry(ies)** that most accurately define your relationship with the Data Controller – it is identified with the objective of data processing. It is possible that the Data Controller and you, as the Partner, have several types of relationships, in which case you will find appropriate more boxes in the first column, and you should, therefore, verify our privacy notice based on more data processing

purposes. Please bear in mind that it is possible that you may have different relationships with several members of the Group, so different lines will provide you with information in respect of the various members of our Group.

Purpose of data processing	Processed data	Basis of data processing on the grounds of the GDPR	Source of data	Data subjects involved in data transfer	Duration of data processing	Data storage
Offering process during the sale of products or services	Contact data of Partners and offerers, correspondence, offers	Consent of the Partner and its Contact Person	Partner's contact person	Group members, where the Partner contracts with the Manufacturer with the contribution of the Data Processor or the Manufacturer if the Manufacturer undertakes a warranty,		electronically
in the case of the purchase of vehicles or parts, after-sales customer care following contracting and performance	Identification and contact data of the partner and natural person contracting party, data related to correspondence, offers and the performance of the contract (e.g. contact details and natural identification data of authorised vehicle driver)	For the fulfilment of the contract and reporting data to the public registers.	Partners and/or Partner's contact	members of the Group, manufacturers, dealers and providers of related services,	not less than the limitation period of claims from the termination of the contract +12 months,	electronically and on paper
Management of vehicle warranty/guaranty, servicing, customer relations	Contact details of the Partner and contact persons acting on behalf of the Partner, identification data and contact details of proxies acting on behalf of the Partner if the	identify the proxy	Partner's contracting person and/or Partner's contact person, Data Controller, a subcontractor of the Data Controller that is involved in	manufacturers, manufacturers' representatives, call centres maintained by	not less than the limitation period of claims from the termination of the contract +12 months; where the document is the basic certificate	Electronically; orders and documents in proof of performance: printed form on paper

	authorisation is not available (typically: drivers), correspondence regarding vehicle warranty and vehicle service, offers, certificates of performance, correspondence			of related services	related to the accounts, for the period laid down in the accounting and tax legislation	
Contribution to the financing of the vehicle purchase	Natural person <b>Partner's</b>	the contract	Partner's contracting person and/or data subject as the contact person, financial services company	engaged in pre- screening, make offers and conclude contracts during the financing	Not less than the limitation period of claims from the termination of the contract +12 months; where the document is the basic certificate related to the accounts, for the period laid down in the accounting and tax legislation	electronically
contribution to the conclusion of insurance	Partner's identification and Partner's contact details, financial information, Copy of the insurance policy	For fulfilment of the contract	Partner's contracting person and/or Partner's contact person, company providing insurance services	carrying out insurance mediation services,	Not less than the limitation period of claims from the termination of the contract +12 months, provided, that the Partner's personal identifier will be deleted immediately after the conclusion of the insurance contract	Electronically
Involvement in the roadworthiness test	•	for the fulfilment of the contract	Contracting Partners and/or		Not less than the limitation period of	On paper

	and Partner's contact information, personal identifiers, copy of the insurance policy	for the fulfilment of legal obligations	Partner's contact person	the vehicle registration	claims from the termination of the contract +12 months, provided, that the Partner's personal identifier will be deleted immediately after the test	
Administration related to the vehicle records	Natural person Partner's identification and Partner's contact information, copy of signature sample, copy of the insurance policy	for the fulfilment of legal obligations	Partner's contracting person and/or Partner' contact person Government agencies, such as the vehicle registration authorities and tax authority;	Agent involved in the vehicle registration process, vehicle registry, financial service provider that provides financing	Not less than the limitation period of claims from the termination of the contract +12 months, provided, that the Partner's personal identifier will be deleted immediately after the test	On paper
Administration of insurance claim	natural person owners, operators of vehicles, drivers, injured persons and person(s) causing the damage and Partner's contact data, personal identifiers (M), information on criminal records, medical records, Identification and medical data in insurance	the contract; Medical or	and / or Partner's contact person, person making the claim or having an interest therein, damage claim reporting, financial	Persons involved in insurance administration, claims management, insurer and damage experts, businesses engaged in repair, financial service provider that provides funding, Marsh Biztosításközvetítő Zrt.		Electronically and on paper

	relating to insurance claim processing				provided, that the identification data of individuals are deleted immediately after the data transfer	
Administration of vehicles breaking down abroad during the lease period and the warranty period	order and the fulfilment process	the legitimate interest of the Data Controller	Companies operated by the manufacturers, which coordinate service works	Members of the Group, manufacturers, manufacturers' representatives, call centres maintained by the manufacturers, dealers and providers of related services	Not less than the limitation period of claims from the termination of the contract +12 months	Electronically
Invoicing, performance of financial claims and liabilities, keeping accounting records		On order to fulfil the contract and meet legal obligation	contact person,	consultants, advisers and financial service providers, legal experts,	Where the document is a basic certificate related to the accounts, for the period of time defined in the accounting and tax legislation	Electronically and on paper
Debts and litigation management, civil litigious and non-litigious proceedings during the enforcement or defence of legal claims	Partner's identification and contact information, official identifiers, during the administration of ongoing damage claims	For fulfilment of the contract	and/or data subject contact person,	representatives, notaries public, courts, bailiffs, liquidators, dispute resolution	Where the document is a basic certificate related to the accounts, for the period of time defined in the accounting and tax legislation	Electronically and on paper

Vehicle test drive and trying to come to know the services recommended by the Data Processor for the Vehicles and the features of the vehicles	Personal data of Partner, Official identifiers of the Partner's Driver	For fulfilment of the contract	Partner, Partner's contact person, Driver	Manufacturer	The data of the Driver will be immediately erased after the Vehicle is returned free from damage or defect. In the case of a dispute, the date is kept until the expiry of the limitation period after the final closing of the dispute. The data of the Partner and the Contact Person will be kept until revoked, but for not more than 10 years.	Electronically
Events, programmes, roadshows, shows, exhibitions: To get to know the preferences of the Partner, personalize the services available to and the preferences of the Partner, manage and develop existing business relationships, get to know the services offered by the Data Processor and the features of the vehicles, and to ensure legal compliance	Partner and the	Based on the Partner's or Contact Person's consent	Partner and Partner's Contact Person	Manufacturer	As long as the consent is withdrawn, but for not more than 10 years	Electronically

Marketing activities, in the course of which the Data Controller informs the Partner of its existing or future services, products, the promotions concerning the same and assesses the Partner's requirements through the channels specified by the Partner in its consent, i.e. by phone, mail, in person, by sharing newsletters on other social platforms, in order to prepare personalized offers	by the Partner for marketing communication by the type of communication and channel. Data on the vehicles of the Partner, typical data concerning the Partner's business and its area, Partner's preferences and past purchases	consent		Manufacturer	For the period indicated in your consent or until you withdraw your consent. The Data Provider's services are long-term services, so if the service is used, the data are kept for 12 months after the limitation period calculated from the termination of use	
Campaigns organized by the Data Controller, prizes and competitions	Data Controller and its Contact Person, data concerning the Data Controller's vehicles,	Partner, its contact person; based on the consent of the participants in the competition	Other data subjects	organization of a sweepstake or contest, the Manufacturer is a	For the period defined by the accounting and tax legislation; the data of the participants in the competition are kept until the next competition is held	Electronically
provided by the Data Controller through competitions and by presenting the winners,	individual photos at the	Partner, Partner's contact person, consent of other data subject	Other data subject	Members of the Group, Manufacturer, professional news portals, to professional media service providers	10 years from the date of the competition	Electronically
While visiting the Websites	Detailed information under the keywords 'Cookies' and 'Remarketing'	Partner, Partner's contact person or other data subject,	Visitor	Detailed information	Detailed information	Electronically

Visiting social platforms: Facebook, Instagram, Twitter	Detailed information under the keyword 'Social Media'	persons who visit our Website or social platforms  Detailed information under the keyword 'Social	Visitor	'Social Media'	under the keywords 'Cookies' and 'Remarketing'  Detailed information under the keyword 'Social Media'	electronic
		Media'				
Protection of leased vehicles during the lease in case the vehicle disappears or is not returned to the Data Controller's possession by the lessee within 48 hours after the termination of the lease contract	Vehicle positioning data	legitimate interests of the Data Controller with the proviso	in the collection, managing, organisation and processing of positioning data	agencies, lessees, financial service companies involved in financing the vehicles, vehicle owners and operators, drivers	during the term of the lease	Electronically
Finding the Data Controller's vehicles (only in the case of lease contracts)	Positioning data of vehicle, personal data of the Partners leasing the Vehicles, data of the Drivers, financial data	interests of the Data Controller	Government agencies, such as: authorities keeping records of the documents of individuals or vehicles and the tax authority	agencies, lessees, financial service companies involved in financing the vehicles, vehicle owners and operators,		Electronically
Surveying the satisfaction of the contracted Partner by the Data Controller	Data on and related to partner satisfaction	Partner, Partner's contact person, consent	Partner or its contact person	Members of the Group or person they delegate; for FORD	Ford Otosan and Mercedes Benz Hungaria Kft.	Electronically

	surveys and performing the survey	of other data subject		vehicles: Data Controller: Delta- truck, Data Processor of FORD OTOSAN, Mercedes Benz Hungaria Kft. and its data processor		
through a bank account	Partner's personal data: name, address, bankcard number, bank account number	consent	registers (company register)	institution that is	Transferred only to the financial institution	Electronically

## Recipients - Parties involved in data transfer

In case the Partner (data subject) selects the appropriate Vehicle, Financier or insurance, the Data Controller transfers his data to the Manufacturer, Financier or Insurer. In all cases, the Data Controller informs the data subject, and the data are transferred with the data subject's consent. Data can be transferred on paper or electronically.

Data Controllers transfer their customer requests to each other electronically based on the data subject's consent. The following relevant data is provided: name, telephone number and e-mail address of the data subject.

Information on data collected while visiting the Website, Facebook, Twitter or other social platforms:

# **COOKIES**

We use cookies in different forms on our Website. Cookies are small data packets that help us recognize you again as a visitor and we use for analysing your usage habits. The data produced during the process are transferred to and stored on the service provider's server. Cookies help us make the use

of the website more comfortable, more efficient and safer. Cookies are used to measure page visitation and help navigation in general. You can read more on the subject here: https://deltatruck.hu/sutik-kezelese/

SOCIAL MEDIA

On our Website, we use so-called social modules (plugins), such as Facebook, Instagram, YouTube and Twitter. These services are provided by Facebook Inc., Google Inc. and Twitter Inc. ("Service Provider").

Facebook is operated by Facebook ("Facebook"). Information on and the appearance of the Facebook plugins can be viewed at the following link: <a href="https://developers.facebook.com/docs/plugins">https://developers.facebook.com/docs/plugins</a>

Twitter is operated by Twitter Inc. ("Twitter"). Information on and the appearance of the Twitter plugins can be viewed at the following link: <a href="https://developer.twitter.com/en/docs/twitter-for-websites/tweet-button/overview">https://developer.twitter.com/en/docs/twitter-for-websites/tweet-button/overview</a>

If you visit any of our Websites that contains plugins, your browser creates a direct connection to the Facebook, Google or Twitter server. The content of the plugins is transmitted and integrated directly into the browser by the respective provider. Thanks to the installation of the plugins, the service provider receives information about that its browser has loaded the respective page even if you do not have a profile or are not logged in. This information (including your IP address) is transmitted directly from the browser to the server of the service provider in the US and stored there.

If you are logged in to a service provider, the service providers assign your visit to our Website to your Facebook or Twitter profile. If a connection is established with the plugins, e.g. the "Like" or "Twitter" button is used, the corresponding information is also transmitted directly to the service provider's server and stored there.

The information is posted in the social networks and shown on the Service Provider's website, where your data is displayed. You can read more about the purpose and scope of the data collection and information on the further processing and use of the data, as well as your rights and the data protection settings in the service provider's data protection provisions:

Facebook: http://www.facebook.com/policy.php

Twitter: <a href="https://twitter.com/privacy">https://twitter.com/privacy</a>

Instagram: https://help.instagram.com/402411646841720

YouTube: <a href="https://www.youtube.com/about/policies/#community-guidelines">https://www.youtube.com/about/policies/#community-guidelines</a>

Google: <a href="https://policies.google.com/privacy?hl=hu">https://policies.google.com/privacy?hl=hu</a>

Waze: <a href="https://www.waze.com/hu/legal/privacy">https://www.waze.com/hu/legal/privacy</a>

If you do not want Google, Facebook, Instagram, YouTube, Waze or Twitter to collect information about your online activities, you can log out of the respective service provider before visiting the Website. You can load the plugins into your browser with the aid of Add-Ons, e.g. Skrip-Blocker "NoScript" (http://noscript.net/).

# **GOOGLE ANALYTICS**

This website uses the Google Analytics web analytics service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", that is, files stored on your computer that allow an analysis of your use of the website. The information generated by the cookies on your using the website is generally transmitted to a Google server in the USA and stored there.

However, based on the activation of IP anonymization on this website, Google first shortens your IP address within the European Union Member States and other contracting states of the Agreement on the European Economic Area. The full IP address is transmitted to the Google server in the US, where it is shortened, only in exceptional cases. Acting on behalf of the operator of this website, Google will use this information to evaluate the use of the website, draw up reports on events on the website and provide additional services related to the use of the website and the Internet to the operator of the website. In the context of Google Analytics, the IP address transmitted by your browser is not linked to other Google data. You can prevent the storage of cookies by adjusting your browser software accordingly. However, please keep in mind that in this case, you may not be able to use all features of the website entirely. Besides, you can prevent Google from collecting data generated by the cookies and your use of the website (including IP addresses) and the processing of these data by Google if you download and install the appropriate plugin.

## Use of the remarketing feature

Displaying targeted ads using 'remarketing'.

The sites and subsites of all webpages operated by the Data Processors use so-called 'remarketing tags'. 'Remarketing tag' includes the JavaScript components that can be found in the source code of the website. If the user visits the site, which contains a remarketing tag, the provider of online advertising (e.g. Google) places cookies on the user's computer and assigns it to the appropriate remarketing target group list. These cookies are used

to turn on the remarketing campaigns (targeted advertising) on other websites. Studies show that the use of targeted advertising is more interesting for Internet users than advertising they are not interested in directly or are not related to the pages visited.

## **Settings and disabling options**

Third parties, including Google, use cookies to turn on advertising, which is based on the user's previous visits to our website, but does not store personal data. The users these websites can disable the use of cookies through Google loading the https://adssettings.google.com/authenticated interface. Furthermore, users can turn off cookies used by third-party providers by visiting the **Network Advertising Initiative** deactivation page and modify the settings there as needed.

# **FACEBOOK PIXEL**

Our pages also include the remarketing tags of the social network of Facebook (1601 South California Ave., Palo Alto, CA 94304, USA). When you visit our pages, the remarketing tags establish a direct connection between your browser and the Facebook server. Facebook receives the data with your IP address. As a result, Facebook can assign our visited pages to your user account. We can use this information to display Facebook advertisements. Please note that, as a site provider, we do not know the content of the transmitted data or the use of Facebook. For more information, see Facebook's privacy policy: <a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>. If you do not wish Facebook to add you to certain lists by targeting Custom Audiences, you can terminate the Custom Audiences settings <a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>.

Measures taken for the sake of data security: data is continuously organized, and we operate internal policies and privilege management systems on the processing, accessing, alteration, erasure and destruction of data, which are reviewed periodically. The Partners' data is protected against accidental and/or unlawful access, alteration or destruction, as well as other data processing by technical and organizational measures, including any unauthorized disclosure and transmission of the Partners' data. Such measures include, in particular, the following: ensuring adequate firewall and use of safe and controlled devices and server rooms. Data security is especially important when engaging third parties to provide and implement IT systems and services (e.g. subcontractors engaged in data processing). The data security requirements are properly kept in the course of managing and controlling access to the information technology systems.

# **Exercise of rights**

In the exercise of your rights, we try to act out of turn. We have up to 30 days for responding and, if the request is adopted, fulfil the request. Please make sure you exercise your rights by sending an e-mail to the e-mail address or a postal letter to our registered address shown in the Introduction. If identification is needed to assess the claim, we will ask for it. If you cannot verify your identity, and there is doubt during the identification, we will not be able to respond to you. In all cases, we provide our reply in the same way as the request was received and notify you of the fulfilment of the request.

#### 1. Access to information:

You have the right to receive information from us in connection with your personal data that were provided to us other than by you. These data categories are detailed in Section II. We provide you with the data that we process about you.

#### 2. Right to rectification:

If you find that your data is not accurate or have changed, please contact us as soon as possible to record your data correctly.

# 3. Right to erasing your data:

The Data Processor will erase all data that it is not entitled to process because it is not justified based on objective, or the objective has ceased, or the processing is unlawful. You can ask us to erase your data. If we have entered into a contract, we cannot erase the data where the erasure concerns data related to the contract as long as we are in a contractual relationship or the contractual relationship has ceased, but either of us can bring a claim against the other. You have the right to have the rest of the data erased in all cases if we have no claim against each other. If you request the erasure of the data before contracting, it may result in that the contract fails.

## 4. Right to withdraw consent to data processing:

You may withdraw your consent to data processing. Your consent to sending the newsletter is continuously provided at the bottom of the newsletter. In other cases, withdrawal of consent will result in the erasure of your data if the data processing is not necessary to perform the contract or a legal obligation. If you request the erasure of the data before contracting, it may result in that the contract fails.

## 5. Right to restriction:

If you dispute the accuracy of your data or believe that we may not process your data, we restricted data processing until we examine what we should do with them.

What does restriction mean?

During the restriction, we may process data only with your consent or in relation to the enforcement of a claim by either of us or the protection of the rights of third persons or for an important public interest. We will inform you about the decision in all cases. You will be notified whether we complied with or rejected the request and we reserve the right to process your data.

# 6. Right to data portability

At your request, we save and deliver your personal data processed in our computer records in a simple electronically convertible form. This right is provided by the law, and we fulfil our obligation.

#### 7. Right to object

The Contact Person has the right to object to the processing of his/her personal data if the processing or transfer of personal data is required exclusively for fulfilling the legal obligation of the Data Controller or the enforcement of the legitimate interest of the data controller, the data recipient or a third party, except in the case of the so-called mandatory data processing, in case personal data are used or transferred for the purpose of direct marketing, public opinion poll or scientific research; and in other cases specified by law. If, according to the findings of the Data Controller, the Contact Person's objection is justified, the data controller terminates all processing operations, including data collection and transmission, blocks the data involved and notifies all recipients to whom any of the Contact Person's personal data had previously been transferred concerning the objection and the ensuing measures, upon which these recipients shall also take measures regarding the enforcement of the right to objection. If the data processing was ordered by the law (e.g. the accounting act), the data controller may not erase the data of the Contact Person, but shall not transfer the personal data to the data recipient if it agreed with the protest or if the court determined that the protest has been legitimate.

#### 8. Right to legal remedy

Of course, we strive to process the minimum amount of data and for the shortest period of time, safely and limited to the purpose. We wish to provide appropriate information on all these matters and comply with your legitimate requests within the 30-day deadline. Nevertheless, it may happen that we do not agree and a dispute arises between us.

1.If you have any complaints, please contact:

Name: Delta-Truck Kft.

- e-mail address: marketing@delta-truck.hu

- Telephone: +36 24 50 22 50

2.NAIH: Postal address: 1530 Budapest, Pf.: 5. address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c. Telephone: +36 (1) 391-1400 Fax: +36 (1) 391-1410 E-mail: ugyfelszolgalat@naih.hu

3. Court: Court of justice competent for the address of the Partner, the Contact Person or other data subject.

Made in Szigetszentmiklós, 01.01.2020

Thank you.