

**DANUBIA PATENT AND LAW OFFICE LLC**  
**PRIVACY POLICY**  
**Date of Effect: 15 April 2019**

The operator of the [www.danubia.com/en](http://www.danubia.com/en) and [www.danubia.com](http://www.danubia.com) websites (hereinafter referred to as **Website**), **Danubia Patent and Law Office LLC**, having its registered office address at Bajcsy-Zsilinszky út 16, 1051 Budapest, Hungary (company registration no.: 01-09-677112) (hereinafter referred to as **Service Provider**), hereby informs Users of the Website that data management on the Website is conducted and services provided by the Service Provider in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter referred to as **GDPR**).

**1. Definitions**

<b>Service Provider</b>	<b>Danubia Patent and Law Office LLC</b> , having its registered office address at Bajcsy-Zsilinszky út 16, 1051 Budapest, Hungary (company registration no.: 01-09-677112), which operates the Website and provides the services
<b>Website</b>	The entire HTML content and WEB services which may be accessed under the domains owned by the Service Provider
<b>User</b>	The person visiting or browsing the Website
<b>Service</b>	Patent- and trademark advice, representation and other legal services provided by the Service Provider
<b>Client</b>	A person contracted with the Service Provider for the purpose of using the Service provided by the Service Provider
<b>Counterparty</b>	The adverse party to the Client in the case or legal matter handled in the course of the Service provided to the Client
<b>Other Participants in the Proceeding</b>	Persons other than the Client and the Counterparty, such as experts, witnesses, intervenors, litigants involved in the proceeding on the same side as the Client, and legal representatives of other participants in the proceeding, who are involved in the case or legal matter handled in the course of the Service provided to the Client.

**2. What is the purpose of the present Privacy Policy?**

Using the Website and the Services, shall create a contract between the Service Provider and the User, or the Client. In the present Privacy Policy and in accordance with the effective legislation, the Service Provider shall provide Users and Clients with detailed information regarding the management of personal data obtained through the Website and in the course of providing the Service.

The Service Provider qualifies as data controller for the data management on the Website. The Service Provider also qualifies as data controller in the course of providing the Services.

### **3. What is the purpose of the Website?**

Users may obtain information on the Website about the Services provided by the Service Provider without needing to register.

Users and Clients are responsible for the data they provide and the content they upload; the Service Provider disclaims any and all liability for such.

### **4. How does the Privacy Policy apply to the User and other data subjects?**

Given that we kindly request Users and Clients to read the present Privacy Policy on our Website carefully, by accessing the Website, using the services which may be accessed on the Website and using the Website functions, the User automatically acknowledges without further notice the terms of the present Privacy Policy.

By entering into a contract for the provision of legal services or ordering the Service, the Client automatically acknowledges without further notice the terms of the present Privacy Policy, to which we also draw the Client's attention in the contract itself.

### **5. Who may amend the present Privacy Policy and how, and where and how will this be made public by the Service Provider?**

The Service Provider has the right to unilaterally amend the present Privacy Policy at any time. The Service Provider shall make public any amendments to the Privacy Policy by displaying the consolidated Privacy Policy incorporating said amendments in a separate menu point on the Website. We kindly request Users and Clients to read the present Privacy Policy on our Website carefully.

The present Privacy Policy may be accessed on the Website at all times. Users and Clients may open, view, print and save, but may not amend the Privacy Policy on the Website; the Service Provider alone is entitled to amend the Privacy Policy.

### **6. What kind of personal data do we manage and for how long, for what purpose do we use it and on what authority?**

The following legislation provides the legal bases for data processing:

- a) pursuant to Article 6 (1) (a) of GDPR, the voluntary informed consent of the User to the processing of their personal data for one or more specific purposes (hereinafter referred to as **Consent**)
- b) pursuant to Article 6 (1) (b) of GDPR, data processing is necessary for the performance of a contract to which the User is party (hereinafter referred to as **Performance of a Contract**)
- c) pursuant to Article 6 (1) (c) of GDPR, data processing is necessary for compliance with a legal obligation to which the data controller is subject (such as compliance with an accounting or bookkeeping obligation – hereinafter referred to as **Legal Obligation**)
- d) pursuant to Article 6 (1) (d) of GDPR, data processing is necessary in order to protect the vital interests of the data subject or of another natural persons (hereinafter referred to as **Vital Interest**)
- e) pursuant to Article 6 (1) (e) of GDPR, data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official

- authority vested in the data controller (hereinafter referred to as **Public Interest**)
- f) pursuant to Article 6 (1) (f) of GDPR, data processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party (hereinafter referred to as **Legitimate Interest**)
  - g) the authorisation to process personal data provided by Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (hereinafter referred to as **Electronic Commerce Act**) 13 / A. § a, according to which the User's natural identity data (name, maiden name, mother's maiden name, place and date of birth) and the User's address may be processed without the User's consent for the purpose of drawing up a contract for the provision of the information society service, determining and amending the contents thereof, monitoring the performance thereof, invoicing the charges arising therefrom, as well as enforcing the claims related thereto; furthermore, data regarding the User's natural identity, address, as well as the time, duration and place of using the service may be processed without the User's consent for the purpose of invoicing charges arising under the contract for the provision of the information society service (hereinafter referred to as **Electronic Commerce Act 13/A. §**).

### 6.1. Data management of persons requesting an offer

The Service Provider processes the following data of persons requesting an offer for the following purposes:

Categories of Data Subject	Categories of Data Processed	Data Source	Purpose of Data Management	Legal Basis for Data Management	Duration of Data Storage and Data Erasure Date
Person requesting an offer	Name	provided by data subject	Providing an offer	Article 6 (1) (b) of GDPR: providing an offer and drawing up a contract	5 years from date of receipt of offer (general limitation period)
	Telephone number				
	E-mail address				
	Given case or legal matter				

The duration of data management and data storage relating to provision of an offer corresponds to the general limitation period of 5 years stipulated in the Civil Code; in the interests of enforcing rights and claims it is required to retain such data within this general limitation period.

### 6.2. Data management for the provision of patent- and trademark law services

In the course of providing patent- and trademark law services, the Service Provider processes the data of the Clients who provide the assignment, that of the counterparty involved in the given case, and that of other participants involved in the case or proceeding in contentious- and non-contentious work and proceedings taking place before different competent authorities and offices. This data management is essential for the provision of the patent- and trademark services.

A	B	C	D	E	F
Categories of Data Subject	Categories of Data Processed	Data Source	Purpose of Data Management	Legal Basis for Data Management	Duration of Data Storage and Data Erasure Date
<p>Client</p> <p>Counterparty</p> <p>Other participants involved in the proceeding</p>	<p>Name</p>	<p>provided by data subject</p>	<p>a) identifying the client</p> <p>b) performing the contract, and providing patent- and trademark services</p> <p>c) maintaining contact</p> <p>d) invoicing</p> <p>e) collecting debts and handling outstandings</p> <p>f) enforcing rights and claims</p> <p>g) conducting business correspondence and written business communication</p>	<p>Purpose D / a) -d) for Client: Article 6 (1) (b) of GDPR: Performance of a contract</p> <p>Purpose D / f) and g) for Client, Purpose D / d) for Other participants involved in the proceeding and Counterparty: Article 6 (1) (f) of GDPR: Legitimate Interest</p> <p>Purpose D / a), b) and e) for Client, Purpose a) and b) for Other participants involved in the proceeding: Article 6 (1) (c) of GDPR: Legal Obligation</p>	<p>8 years from date of closure of the case</p>
<p>Client</p> <p>Counterparty</p> <p>Other participants involved in the proceeding</p>	<p>Mother's maiden name</p>	<p>provided by data subject</p>	<p>a) identifying the client</p> <p>b) performing the contract, and providing patent- and trademark services</p> <p>c) collecting debts and handling outstandings</p> <p>d) enforcing rights and claims</p>	<p>Purpose D / a) -c) for Client: Article 6 (1) (b) of GDPR: Performance of a contract</p> <p>Purpose D / d) and e) for Client: Article 6 (1) (f) of GDPR: Legitimate Interest</p> <p>Purpose D / a), b) for Client, Counterparty and Other participants involved in the proceeding: Article 6 (1) (c) of GDPR: Legal Obligation</p>	<p>8 years from date of closure of the case</p>
<p>Client</p>	<p>Address</p>	<p>provided by data subject</p>	<p>a) identifying the client</p> <p>b) performing the contract, and providing patent- and trademark</p>	<p>Purpose D / a) -d) for Client: Article 6 (1) (b) of GDPR: Performance of a contract</p>	<p>8 years from date of closure of the case</p>

Counterparty  Other participants involved in the proceeding			<p>services</p> <p>c) maintaining contact</p> <p>d) invoicing</p> <p>e) collecting debts and handling outstandings</p> <p>f) enforcing rights and claims</p> <p>g) conducting business correspondence and written business communication</p>	<p>Purpose D / f) and g) for Client, Purpose D / d) for Other participants involved in the proceeding and Counterparty: Article 6 (1) (f) of GDPR: Legitimate Interest</p> <p>Purpose D / a), b) and e) for Client, Purpose a) and b) for Other participants involved in the proceeding: Article 6 (1) (c) of GDPR: Legal Obligation</p>	
Client  Counterparty  Other participants involved in the proceeding	Place and date of birth	provided by data subject	<p>a) identifying the client</p> <p>b) collecting debts and handling outstandings</p>	<p>Purpose D / a), b) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation</p> <p>Purpose D / c) for Client: Article 6 (1) (f) of GDPR: Legitimate Interest</p>	8 years from date of closure of the case
Client  Counterparty  Other participants involved in the proceeding	Personal ID card number	provided by data subject	a) identifying the client	Purpose D / a), b) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case
Client  Counterparty  Other participants involved in the	Address card number	provided by data subject	a) identifying the client	Purpose D / a), b) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case

proceeding					
Client Counterparty Other participants involved in the proceeding	Taxpayer identification number	provided by data subject	a) identifying the client	Purpose D / a), b) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case
Client Counterparty Other participants involved in the proceeding	Personal identification number	provided by data subject	a) identifying the client	Purpose D / a), b) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case
Client Counterparty Other participants involved in the proceeding	Copy of personal ID card and address card	provided by data subject	a) identifying the client b) pursuant to provisions of anti-money laundering legislation	Purpose D / a), b) and c) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case
Client Counterparty Other participants involved in the proceeding	Copy of passport	provided by data subject	a) identifying the client b) pursuant to provisions of anti-money laundering legislation	Purpose D / a), b) and c) for all data subjects: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case
Client Counterparty	Miscellaneous data relating to	provided by data subject	Performing the contract, and providing patent- and trademark services	Article 6 (1) (b) of GDPR: Performance of a contract	8 years from date of closure of the case

Other participants involved in the proceeding	the case or proceeding				
Client Bearer of costs	Invoicing data	provided by data subject	a) performing the contract b) invoicing	Purpose D / a) -d) for Client: Article 6 (1) (b) of GDPR: Performance of a contract  Purpose D / b) for Bearer of costs: Article 6 (1) (c) of GDPR: Legal Obligation	8 years from date of closure of the case
Client Counterparty  Other participants involved in the proceeding	Data relating to criminal liability and decision, which is considered as sensitive data, in cases of discrimination, special data processed in assignments	provided by data subject	Performing the contract, and providing patent- and trademark services	for Client: Article 6 (1) (d) of GDPR: Vital Interest  for other data subjects: Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of closure of the case
Client Counterparty  Other participants involved in the proceeding	E-mail address	provided by data subject	Maintaining contact	for Client: Article 6 (1) (b) of GDPR: Performance of a contract  for Other participants involved in the proceeding and Counterparty: Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of closure of the case

Client Counterparty Other participants involved in the proceeding	Telephone number	provided by data subject	Maintaining contact	for Client: Article 6 (1) (b) of GDPR: Performance of a contract  for Other participants involved in the proceeding and Counterparty: Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of closure of the case
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**6.3. Data management relating to marketing and circulation of newsletters**

Danubia sends out newsletters exclusively to those persons who have subscribed to the newsletter. You can subscribe to the newsletter by ticking the appropriate checkbox or by clicking on the appropriate button on the Website. Subscribers to the newsletter may unsubscribe from the newsletter at any time, either by notifying the Service Provider in writing of their intention by e-mail or letter to the Service Provider’s registered office address, or by clicking the unsubscribe link at the bottom of each newsletter.

The Service Provider will no longer send the newsletter to anyone who has unsubscribed therefrom.

In the event you withdraw your consent, you may provide your consent again at any time. Providing your consent alone is not a condition for accessing any of the Services. At the same time as providing your consent, you must provide your name and e-mail address; without this you cannot provide your consent. You will also be required to provide your name and e-mail address for identification purposes in order to withdraw your consent.

Categories of Data Subject	Categories of Data Processed	Data Source	Purpose of Data Management	Legal Basis for Data Management	Duration of Data Storage and Data Erasure Date
Recipients of the newsletter	Name	User as data subject	Sending electronic direct marketing messages and newsletters via direct marketing	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data	Until consent is withdrawn
	E-mail address	User as data subject	Sending electronic direct marketing messages and newsletters via direct marketing	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data	Until consent is withdrawn



#### 6.4. Managing contact data of contracted Clients

The Service Provider shall use the contact data of those Clients contracted with the Service Provider for the purposes of performing the contract concluded with the Client and maintaining contact with the Client in the following manner:

A	B	C	D	E	F
Categories of Data Subject	Categories of Data Processed	Data Source	Purpose of Data Management	Legal Basis for Data Management	Duration of Data Storage and Data Erasure Date
Contact data of contracted Clients	Name	Contracted Client	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights d) conducting business correspondence and written business communication	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination of contract for data not appearing in contract
	Telephone number	Contracted Client	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination of contract for data not appearing in contract
	E-mail address	Contracted Client	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights d) conducting business correspondence and written business communication	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination of contract for data not appearing in contract
	Position	Contracted Client	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination

					of contract for data not appearing in contract
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It is in the legitimate interest of both the Service Provider and the Client that the Client may be continuously available through their contact person. Contact details are limited and only contain that data which is essential from the point of view of sending notification; the telephone number and e-mail address provided shall generally serve expressly for business communication, which does not therefore disproportionately affect the fundamental rights and freedoms of the contact person.

In the event the data constitutes a part of the contract, the retention period corresponds to the retention period stipulated under the Accounting Act for the retention of the contract. Should the data not appear in the contract, the retention period shall be the standard 5-year general limitation period stipulated in the Civil Code.

**6.5. Data managed during the automatic collection of data related to the Website**

We use cookies and different programmes on the Website to understand the Website Users' needs and behaviour in relation to the Website, and thereby further develop the Website, and to generate anonymous statistics concerning Website visits. The information collected on the Website is detailed below:

Categories of Data Subject	Categories of Data Processed	Data Source	Purpose of Data Management	Legal Basis for Data Management	Duration of Data Storage and Data Erasure Date
Users visiting the Website	IP address, country, browser used, device and operating system type and version, language settings, date of visit	automatically collected by Service Provider	generating statistics, developing the Website, identifying and recognising the User	Article 6 (1) (f) of GDPR: Data processing is necessary to enforce the Legitimate Interests of the data controller	2 years at most from time of visit
	Website visit data (pages viewed, time spent, clicks, pages opened)	automatically collected by Service Provider	generating statistics, developing the Website, identifying and recognising the User	Article 6 (1) (f) of GDPR: Data processing is necessary to enforce the Legitimate Interests of the data controller	2 years at most from time of visit

The above data management is in the legitimate business interest of the Service Provider, as it can thereby develop and ensure the security of its Website. The scope of data managed and collected is not significant. The Service Provider uses this data solely for the purposes of generating statistics, analysing and profiling (collecting behavioural preferences); automated decision-making based on this data does not take place, neither does the Service Provider send personalised offers to the Users based on this data. The management of this data does not therefore disproportionately affect the fundamental rights and freedoms of the User.

When the User visits the Website and uses the Services, we place cookies on the User's browser and HTML-based e-mails in accordance with the present Privacy Policy.

In general, a cookie is a small file made up of letters and numbers that is sent to the User's device from our server. The cookie enables us to recognise when the User last logged on to the Website; the main purpose of the cookie is to enable us to prepare personalised offers for the User and make advertisements available to the User which personalise their experience in using the Website and express the User's personal requirements.

We would like to point out that the data collected is not used for profiling purposes.

**The purpose of cookies used by the Service Provider:**

- a) Security: to support and enable security, and assist the Service Provider in detecting unlawful conduct
- b) Preferences, Features and Services: to inform the Service Provider which language the User prefers, what the User's communication preferences are, and help and facilitate the User in completing forms on the Website
- c) Performance, Analytics and Research: to help the Service Provider understand how the Website performs in different places; the Service Provider may also use cookies that evaluate, improve and search the Website, products, features and services, including when the User accesses the Website from another Website, or devices such as the User's computer or mobile device.

**Types of cookies used by the Service Provider:**

- a) analytics, tracking cookies
- b) session cookies, which only work for as long as the session lasts (usually a visit to the Website or a browser session)
- c) persistent cookies, which help identify the User as an existing User, making it easier to return to the Website without having to log in again; once the User logs in, the persistent cookie stays in the User's browser and the Website can read it when the User returns to the Website.

**Third-party cookies:**

Trusted partners help the Service Provider serve advertisements on and off the Website, and analytics providers, such as Google Analytics and Facebook Pixel, may also place cookies on the User's device.

Users may opt out of using Google cookies on the Google Ads Disable Page.

The User can also block cookies from other external providers at <http://www.networkadvertising.org/choices/>.

**Cookie Control**

Most browsers allow Users to control the use of cookies through settings. However, if the User restricts the Website's use of cookies, this may impair the User experience. The User may also stop saving personalised settings, such as login information.

In the event the User does not wish the Service Provider to use cookies when they visit the Website, the User may disable the use of cookies. In order for the Service Provider to become aware that the User has disabled the use of cookies, the Service Provider will place a disabling cookie on the User's device, so the Service Provider will know that it cannot place cookies on the device the next time the User visits the Website. If the User does not wish to receive cookies, the User may change the browser settings on their computer. This website does not function properly without cookies.

For more information about cookies, including the type, handling and erasure of cookies, visit [wikipedi.org](http://wikipedi.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.org).

### 6.6. Managing contact data of contracted suppliers

The Service Provider manages the contact details of its contracted suppliers.

A	B	C	D	E	F
Categories of Data Subject	Categories of Data Processed	Data Source	Purpose of Data Management	Legal Basis for Data Management	Duration of Data Storage and Data Erasure Date
Contact data of contracted suppliers	Name	Contracted Supplier	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination of contract for data not appearing in contract
	Telephone number	Contracted Supplier	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination of contract for data not appearing in contract
	E-mail address	Contracted Supplier	a) maintaining contractual relations b) performing the contract c) enforcing claims and rights	Article 6 (1) (f) of GDPR: Legitimate Interest	8 years from date of termination of contract for data appearing in contract  5 years from date of termination of contract for data not

					appearing in contract
	Position	Contracted Supplier	<ul style="list-style-type: none"> <li>a) maintaining contractual relations</li> <li>b) performing the contract</li> <li>c) enforcing claims and rights</li> </ul>	Article 6 (1) (f) of GDPR: Legitimate Interest	<p>8 years from date of termination of contract for data appearing in contract</p> <p>5 years from date of termination of contract for data not appearing in contract</p>

It is in the legitimate interest of both the Service Provider and the supplier that the supplier may be continuously available through their contact person. Contact details are limited and only contain that data which is essential from the point of view of sending notification; the telephone number and e-mail address provided shall generally serve expressly for business communication, which does not therefore disproportionately affect the fundamental rights and freedoms of the contact person.

In the event the data constitutes a part of the contract, the retention period corresponds to the retention period stipulated under the Accounting Act for the retention of the contract. Should the data not appear in the contract, the retention period shall be the standard 5-year general limitation period stipulated in the Civil Code.

**6.7. Managing contact data of job applicants**

CVs and other data submitted by applicants for employment with the Service Provider will be processed as follows:

We hereby advise you that by submitting your CV and job application, you consent for the purposes of recruitment, job offers, contact and identification to your personal data being processed and stored, and to receiving messages and notifications to the contact details provided.

In the course of applying for a specific position, the personal information you provide, as indicated below, as well as any other personal data collected about you, will be managed for the duration of the recruitment process and all data will be erased at the same time as the recruitment process is closed. In the event the recruitment process becomes protracted and lasts for more than one year, we will manage your data for at most one year from the date of submission, upon expiry of which we may again ask you if you wish to extend the period during which your data will be managed for the full duration of the recruitment process, i.e. beyond the initial one year. If you do not respond to this question within 30 days, or if you do not wish to extend the period of data management, your data will be erased.

However, irrespective of the position you are applying for, you also have the opportunity to request your data be saved and managed within our database for the purpose of future recruitment and receiving job offers from us. We would request your separate consent for this, which once provided, will entitle us to manage your data for two years in our database specifically for this purpose. The reason for limiting this period to 2 years is that we need to ensure the accuracy and up-to-date nature of the data you have provided, and that we have collected and manage about you, and once three years have elapsed it can no longer be guaranteed that the data has not become outdated and inaccurate. Before the three-year period has elapsed, we may contact you again in order to obtain your consent for your data to be managed for a further 2-year period, when we recommend that you update the data you have provided and ensure it is accurate. If you do not consent to your data being managed further or do not respond to us within 30 days of the notification being sent to you, your data will be erased from the database.

In the event we establish an employment relationship with you, the management of this data will be governed by the data management period of duration set out in our Employee Data Management Policy, about which you will be informed at the time of concluding your employment contract.

The legal basis for data management is defined below for each category of data and for each purpose of data management:

<b>Type of Data Processed</b>	<b>Data Source</b>	<b>Purpose of Data Management</b>	<b>Legal Basis for Data Management</b>
CV data (education, schools and universities attended, previous employers, professional experience, hobbies, etc.)	Applicant as data subject	Recruitment Making a job offer Maintaining contact Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Name	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer Maintaining contact Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Telephone number	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer Maintaining contact Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
E-mail address	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer Maintaining contact Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Address	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer Maintaining contact Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Place and Date of Birth	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Nationality	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Photograph	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer Identification	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data

Language skills	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Type of driving licence	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Membership in any civil societies	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Publications, presentations and projects	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Qualifications	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Prizes and awards	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
References	Applicant as data subject Headhunter, employment agency CV from database	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Social media data	Service Provider's own research	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Personality and behavioural characteristics observed during interview necessary for judging suitability	Service Provider's own research	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data
Results of professional tests	Service Provider	Recruitment Making a job offer	Article 6 (1) (a) of GDPR: data subject has given consent to processing of their personal data

#### How do we use public information available on social media sites?

When you respond to a job advertisement, we can view your profile, activities, posts and comments on social media sites, including Facebook and LinkedIn, in order to determine whether you are suitable for the position advertised. We only view publicly available information about you on social media sites, and do not search you in closed groups or other non-public or restricted public sites. Furthermore, we do not save or store your social media profile, neither do we make a record of this.

We do not manage sensitive or special category information about you based on your social media profile data. We only view data on social media sites about you which is relevant to the job advertisement and the position you are applying to fill.

### **Management of the results of professional- and aptitude tests**

When you apply for a position with Danubia, we may also conduct professional tests and professional aptitude tests with you. We conduct these tests and aptitude tests, and once the tests have been evaluated, the tests and the responses you have provided to them will be destroyed immediately and you will be informed of the result of the tests. Before conducting each such professional test and aptitude test, we will inform you of the skill or ability that the test is aimed at assessing, the means and method employed in the test, as well as whether it is required by law and, if so, we will indicate the applicable law.

The details and documentation relating to the professional tests and aptitude tests will be destroyed by the Employer once the evaluation has been completed, and only the information that you are suitable for the job indicated in the job advertisement will be retained.

### **Notification of successful application**

Once the recruitment process is completed, you will be notified by e-mail whether we intend to establish an employment relationship with you.

### **Granting and withdrawing consent**

By actively submitting your application for a job advertisement you provide your voluntary consent to the management of the above data for the above purposes. You may withdraw your consent to data management at any time by sending an e-mail to that effect containing the following mandatory details, name, date of birth and e-mail address, to [gdp@danubia.hu](mailto:gdp@danubia.hu) in order for us to be able to identify whose data to erase.

In the event you withdraw your consent, this will erase all the data we manage about you, including data you have provided, data we have searched and data obtained from other sources. The obligation to erase the data applies to data stored both electronically and on paper, and also applies to the records and conclusions we have made about you.

## **7. Who manages the personal data and who has access to it?**

### **7.1. Data Controller**

The Service Provider is the data controller of the data specified in Section 6, whose contact details and company data are as follows:

#### **Danubia Patent and Law Office LLC**

Registered Office Address: Bajcsy-Zsilinszky út 16, 1051 Budapest, Hungary  
Company Registration No.: 01-09-677112



Tax No.: 11794479-2-41  
Represented by: Dr. Árpád Pethő, Managing Partner, who may be reached at the Company's Registered Office Address, at the Company's office and by telephone on the following number  
Telephone No.: +36-1-411-8700  
E-mail address: [central@danubia.hu](mailto:central@danubia.hu)  
Website: [www.danubia.com/en](http://www.danubia.com/en)

On the part of the Service Provider, the Service Provider's employees have access to the data to the extent strictly necessary for the performance of their work. Access to your personal data is governed by strict internal policies.

## **7.2. Data Processors**

We use different companies with whom we have a data processing contract to manage and store your data. If you have any questions about the data processors we employ, you can put these to us by writing to us at: [gdpr@danubia.hu](mailto:gdpr@danubia.hu).

## **8. Who is the Service Provider's Data Protection Officer and what are their contact details?**

The Service Provider is not obliged to appoint a Data Protection Officer.

## **9. To whom do we forward your personal data?**

The Service Provider shall forward the personal data of Clients, Counterparties, Other Participants in the Proceeding according to Point 6.2. of the present Privacy Policy to the competent authorities handling the case on the latter's behalf in the scope of the provision of patent- and trademark law services.

With the express consent of the Clients and their contact person, the Service Provider shall forward the name, telephone number and e-mail address of the Clients and their contact person to the professional organisations responsible for ranking professional legal activities:

- a) World Trademark Review (Globe Business Publishing Limited. 03205159, St Brides House, 10 Salisbury Square, London, EC4Y 8EH),
- b) Managing Intellectual Property – IP Stars (Euromoney Institutional Investor PLC Company – 8 Bouverie Street, London, EC4Y 8AX),

for the purpose of those organisations conducting interviews with Clients and their contact person in order to conduct research for ranking purposes. Each of these organisations is an undertaking established and operating in the European Union, so the transfer of data to them is not considered as transfer of data abroad, and as such no explicit consent is required. These undertakings are independent recipients of the data transfer, and in each case their own privacy policy applies to their own data management. The Service Provider carries out these transfers on the basis of contracts concluded with these undertakings.

## **10. What rights do you have with regard to managing your personal data and how do we ensure that these are exercised?**

- a) **Right to Access:** you may request information about what data we manage, for what purpose, for how long, to whom we forward it and the origin of the data we process about you.
- b) **Right to Rectification:** in the event your data changes or is incorrectly recorded, you can request the rectification or correction of your data; we would request you check your data on a regular basis and notify us of any changes affecting your data within 15 days, so that we can ensure the data we hold about you in our database is always up-to-date and accurate.
- c) **Right to Erasure:** in cases specified by law, you may request the data we hold be erased.
- d) **Right to Restrict Data Management:** in cases specified by law, you may request that we restrict management of your data.
- e) **Right to Object:** in the case of data management based on a legitimate interest, you may object to the management of your data, in which case we will not continue to manage your data and will erase it, unless data management is justified by a legal obligation or other legal basis.
- f) **Right to Data Portability:** you may request your data be transferred or 'ported' elsewhere by completing the Data Transfer Request form attached to this Privacy Policy, exercising your right to disclose information of a statutory nature to you, or transferring it directly to another service provider you designate upon your specific request and authorisation. We would draw your kind attention to the fact that a data portability request can only be made on the data that you provide to us with your consent and may only be submitted in the case of data processed automatically, and that the data portability request for transfer to another service provider can only be met if technically and securely possible.
- g) **Right to Withdraw Consent:** when we manage your data on the basis of your consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of our data management prior to the withdrawal of your consent.
- h) **Right to Lodge a Complaint:** in the event of our data management activity being in violation of the law, you have the right to lodge a complaint with the competent supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information

Website: <http://naih.hu>

PO Box Address: 1374 Budapest, Pf. 603.

E-mail Address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Telephone No.: +36 (1) 391-1400

Furthermore, you may also file a lawsuit against the Service Provider in the event of the latter being in breach of its obligation to protect your personal data.

You may submit your requests to exercise your rights detailed above by sending an e-mail to us at our [gdpr@danubia.hu](mailto:gdpr@danubia.hu) customer service e-mail address or by writing to us at our Service Provider Registered Office Address; in the event of such a request being received, we will act as required by law and inform you, within one month, of the action we have taken in response to your request.

In the context of information requested under the right to access, we note that if the release of a copy of such adversely affects the rights and freedoms of others, we will consider your request and, if appropriate, refuse to comply with it under Article 15 (4) of the GDPR.

#### **11. How do we ensure your data is secure?**

The Service Provider has executed and implemented the following information security measures in the interests of ensuring data is appropriately protected:

We regularly train our employees on data- and information security requirements.

In accordance with the Service Provider's strict rights management regulations, personal data is stored on the Service Provider's computers, to which physically and the information stored on them digitally, only a limited number of persons and employees have access.

The use of work computers (office workstations) requires a password.

Our servers are housed in enclosed server rooms equipped with water- and fire protection and intrusion prevention systems.

Our IT systems are regularly and recurrently tested and audited to ensure that data- and IT security is in place and maintained.

Office workstations are password protected; the use of external data carriers is restricted and only permitted under secure conditions subsequent to being verified.

All components of the Service Provider's IT system, including office workstations, are protected on a regular and ongoing basis against malicious software.

In designing and operating programmes, applications and tools we prioritise security features separately and manage them separately.

We take care of the physical and IT protection of data affecting the security of the information system (e.g. passwords, authorisations and logs).

In order to meet the requirements of secure data exchange for electronically transmitted messages and files, we ensure the integrity of the data for both (communication) control and user data.

With respect to the network used for data transmission, we ensure that illegal connections and eavesdropping are prevented in a manner appropriate to the level of security.

In the course of records management we comply with the data security requirements set out in our records management policies.

When we destroy documents stored on data carriers, IT devices, paper and other carriers, we ensure the permanent destruction of personal data.

To ensure physical data security, we ensure that our doors and windows are properly locked and secured, and strict visitor and access rules are in place.

Data carriers used for backing up and archiving purposes are stored securely in an enclosed place. Data carriers storage rooms are designed to provide sufficient security against unauthorised or violent intrusion, fire or natural disasters.

#### **12. What do we do if we have a privacy incident?**

In accordance with effective legislation, we report the incident to the supervisory authority within 72 hours of the incident coming to our attention, and we also keep a record of the incidents. In cases specified by law, we also notify users affected and act in accordance with our incident management policies.

#### **13. When and how do we amend the Privacy Policy?**

In the event of the scope of data being managed and other circumstances of data management changing, in accordance with GDPR, the Privacy Policy will be amended and the amended Privacy Policy published within 30 days at [www.danubia.com/en](http://www.danubia.com/en). Please be sure to read the amendments to the Privacy Policy carefully as they contain important information about the management of your personal data.