

Rheinmetall 4iG Digital Services Kft. · 1037 Budapest · Montevideo utca 2/c · Hungary

## Privacy Notice

This Privacy Notice has been prepared in order to provide information in accordance with the provisions of the General Data Protection Regulation (hereinafter: "GDPR") on how Rheinmetall 4iG Digital Services Kft. (hereinafter: "the Company" or "we") process your personal data in connection with our website and relative to the <https://r4ds.hu/> website (hereinafter referred to as the "website"), inquiries regarding the services we offer, invoicing, and the operation of our LinkedIn community page.

This privacy notice will help you understand how we use and process your personal data on the <https://r4ds.hu/> website and in connection with any potential or existing business relationship with us, and will explain to whom we may disclose such personal data and your rights.

### 1. Who is the data controller?

The data controller is Rheinmetall 4iG Digital Services Kft. (registered seat: 1037 Budapest, Montevideo utca 2/c., email address: [dataprotection@r4ds.hu](mailto:dataprotection@r4ds.hu) ).

If you have any further questions regarding the processing of personal data, please write to us at 1037 Budapest, Montevideo utca 2/c., or send an email to [dataprotection@r4ds.hu](mailto:dataprotection@r4ds.hu) .

### 2. For what purposes do we process your personal data?

We process your personal data for the following purposes:

- **Communication, receiving inquiries:** if you send us an inquiry, we will process your data in order to communicate with you and respond to your questions.
- **Processing contact details for the purpose of fulfilling a contract:** if we have a contractual relationship with the company you represent (as a legal entity), we will process your personal data for the purpose of maintaining contact during the performance of the contract.
- **Issuing and storing invoices:** if we enter into a contract with a natural person or sole trader, we will process your personal data for invoicing (issuing and storing invoices).
- **Website service:** when providing our Website service, we place cookies on your device in accordance with our Cookie Policy when you browse the Website, which are necessary for the Website to function.
- **Collection of analytical data:** When providing our Website, we may place cookies on your device for the purpose of analyzing visit information in accordance with our Cookie Policy, so that we can improve the Website based on your use of it.

**Your personal data submitted in connection with job applications will not be processed through this website.** You can only apply for jobs through the Career Portal maintained by 4iG Nyrt. at <https://karrier.4ig.hu/allasok>. Detailed information on data processing in connection with job applications can be found on the 4iG Nyrt. Career Portal. The data protection policy is available [at this link](#).

#### Rheinmetall 4iG Digital Services Kft.

1037 Budapest · Montevideo utca 2/c · Hungary / Magyarország · Registration no. / Cégjegyzékszám: 01-09-408903

Raiffeisen Bank Zrt. · IBAN (HUF): HU 0912 0010 0801 8701 1700 1000 02 · IBAN (EUR): HU 0912 0010 0801 8701 1700 2000 09

Tax no. / Tax ID: 32144453-2-41 · VAT no. / Community tax ID:

HU32144453

[www.r4ds.hu](http://www.r4ds.hu)

### 3. What personal data do we process for the above purposes?

For the purposes described above, we process the following categories of personal data:

- Your name,
- Your email address,
- Your mailing address in case of postal mail,
- Your telephone number,
- Name and registered seat of the legal entity you represent
- Your position,
- The communication between us,
- Billing address,
- Tax number,
- User data related to cookie management, such as cookie name, user ID, consent to cookies, number of website visits, first and last date of website visits.

### 4. Legal basis for data processing purposes and duration of data processing

If we process your personal data, we rely on the following legal basis:

- Your personal data is processed in order to comply with our legal obligations ("**Legal Obligation Legal Basis**") in accordance with Article 6(1)(c) of the General Data Protection Regulation (hereinafter referred to as "GDPR");
- The processing of your personal data is based on our legitimate interest ("**Legitimate Interest Legal Basis**") pursuant to Article 6(1)(f) of the GDPR;
- We process your personal data based on your consent ("**Consent**") in accordance with Article 6(1)(a) of the GDPR.

In addition to the GDPR, the processing of your personal data is based on the following legislation:

- Section 159(1) and Section 169 of Act CXXVII of 2007 on Value Added Tax (**Áfatv.**) and
- Section 169(2) of Act C of 2000 on Accounting (**Sztv.**).  
Act CVIII of 2001 on certain issues of electronic commerce services and information society services (**Elkertv.**) Section 13/A.

Below we describe the legal basis on which we rely for each data processing purpose, what personal data we process for that purpose, and how long we retain that personal data.

We only process your personal data for as long as it is necessary to achieve the given purpose. If your personal data is no longer needed, we will delete it. Different retention periods may apply to different data processing purposes, which are also detailed in the table below.

Data processing Purposes	Legal basis	Personal data processed	Duration of data processing
<b>Communication , receiving inquiries</b>	Legitimate interest	<ul style="list-style-type: none"> <li>Your name,</li> <li>Your email address,</li> <li>Your mailing address in the case of postal correspondence,</li> <li>Your telephone number,</li> <li>Communication between us.</li> </ul>	<ul style="list-style-type: none"> <li>If a contractual relationship is established with the organization you represent, we will process your personal data for 5 years.</li> <li>If, following your expression of interest, no contract is concluded between us and the communication has no future legal effect, we will delete your data after the last communication.</li> </ul>
<b>Processing of contact details for the purpose of fulfilling a contract</b>	Legitimate interest	<ul style="list-style-type: none"> <li>Your name,</li> <li>Your email address,</li> <li>Your telephone number,</li> <li>Name and registered office of the legal entity you represent,</li> <li>Your position,</li> <li>Communication between us.</li> </ul>	<ul style="list-style-type: none"> <li>We will process the data for 5 years after the termination of the contract (general limitation period).</li> <li>In the event of legal or administrative proceedings, we will process the data until the decision of the court or authority becomes final and binding.</li> </ul>
<b>Issuing and retaining invoices</b>	Legal obligation	<ul style="list-style-type: none"> <li>Your name,</li> <li>billing address,</li> <li>Tax number</li> </ul>	<ul style="list-style-type: none"> <li>We will store this data for 8 years from the date of invoice issuance.</li> </ul>
<b>Website service</b>	Legitimate interest	<ul style="list-style-type: none"> <li>User data related to cookie management, such as cookies cookie name, consent given for cookies the fact that consent has been given</li> </ul>	<ul style="list-style-type: none"> <li>We process the data for 2 years from the date of collection.</li> </ul>
<b>Collection of analytical data</b>	Consent	<ul style="list-style-type: none"> <li>User data related to cookie management, such as cookie cookie name, user ID, number of website visits , number of website visits, first and last date.</li> </ul>	<ul style="list-style-type: none"> <li>We process the data for two years from the date of collection.</li> </ul>

## 5. Description of legitimate interests in relation to personal data processed on the basis of legitimate interests

Purpose of data processing	Description of legitimate interest
<b>Communication, receiving inquiries</b>	Based on our legitimate interest, we process your personal data in order to communicate with you based on your request and to respond to your questions and inquiries.
<b>Processing contact details for the purpose of fulfilling a contract</b>	It is in our legitimate interest to ensure that our contractual relationships run smoothly and that our business partners can contact us at any time without delay. Therefore, it is in our fundamental economic interest to ensure close, direct, and continuous cooperation with our contractual partners in order to fulfill our contractual obligations as quickly as possible and to enforce our rights as effectively as possible. In order to enforce these interests, it is necessary to process your contact details.
<b>Website service</b>	It is in our legitimate interest to place cookies necessary for the operation of the website on your device as specified in the Cookie Policy in order to ensure the proper functioning of the Website and to clearly manage your consent to the processing of your analytical data.

If you require further information regarding the legitimate interest assessment, please contact us at the following email address: [dataprotection@r4ds.hu](mailto:dataprotection@r4ds.hu).

## 6. Recipients of personal data and categories of recipients

Your personal data is accessed by our company's employees on a "need-to-know" basis. In addition, we may share your data with certain service providers in order to achieve the purposes set out above.

With regard to the issuance and storage of invoices, our company's auditor, CMT Audit Korlátolt Felelősségű Társaság (1074 Budapest, Vörösmarty utca 16-18. A. ép. Fsz. 1/F. ajtó) may access data related to invoices in the course of performing its duties, in which case it acts as an independent data controller.

With regard to the collection of analytical data, we use the services of Google Analytics, in which case we act as joint data controllers in accordance with Article 26 of the GDPR. Further information in connection with data processing information in page website <https://support.google.com/analytics/answer/9024351?hl=hu>.

For the data processing purposes detailed above, we use the following service provider as a data processor:

Data processor	Data processor registered office	Data processing activities
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<b>Microsoft Ireland Ltd.</b>	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland	The provider of the Office 365 email system.
<b>Amazon Web Services EMEA SARL</b>	38 Avenue John F. Kennedy, L-1855, Luxembourg	The website hosting provider.
<b>4iG Nyrt.</b>	1013 Budapest, Krisztina krt. 39	Website operation, development and maintenance.

## 7. Data processing related to the operation of the LinkedIn social media page

### 1. Operation of LinkedIn social media page

Our company operates a LinkedIn Page, which is provided by LinkedIn Ireland Unlimited Company (Gardner House, Wilton Plaza, Wilton Place, Dublin 2, Ireland, hereinafter referred to as "LinkedIn"). The LinkedIn Page can be visited by anyone, and the content published there can be viewed by anyone.

4iG Nyrt. (1013 Budapest, Krisztina krt. 39.) acts as a data processor in the operation of our company's LinkedIn page.

Only users with a LinkedIn account can like, comment on, share, or send private messages to us regarding content published on our LinkedIn Page, and only they can follow our LinkedIn Page. Users can also express their opinions and reactions to the information published on the Community Page, ask questions, make comments, and contact us via private messages.

When you visit our LinkedIn Page, not only we, but also LinkedIn, the operator of the social media platform, collects your personal data. LinkedIn provides information about the personal data it processes, the purpose of data processing and its use in the following data protection policy: <https://www.linkedin.com/legal/privacy-policy>.

You can also access our LinkedIn page via the link at the bottom of our website. This link is only intended to enable you to access our LinkedIn page. By clicking on the link, you will be redirected to our LinkedIn community page, where LinkedIn may collect information about you.

We do not keep any records outside the Social Media Page about the data subjects involved in data processing on the Social Media Page or their activities on the Social Media Page, and we do not process the personal data published by the data subjects on the Social Media Page on any other platform or in any other way beyond the above.

We process the following personal data in relation to the Social Media Page:

- following the Community Site, unsubscribing from it (profile name, profile user ID);
- in the case of activities carried out on or in connection with the Community Site: data related to the activity, including writing posts, reviews, sharing posts, commenting on posts, reacting to posts (e.g., liking a post);
- initiating communication with the Community Site via private messages: all information that the data subject brings to our attention during the communication.

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Your personal data **is processed** for the purposes of operating the Community Page in accordance with Article 6(1)(f) of the GDPR, on the basis of our **legitimate interest**. It is in our legitimate interest to inform interested parties about current information, news, and events related to our operations and activities, and to respond to any questions or comments they may have through the Community Site.

## 2. Use of page analytics

LinkedIn, as the operator of the LinkedIn social platform, provides the page analysis (Insights) function. With regard to this function, our Company and LinkedIn are joint data controllers in accordance with Article 26 of the GDPR. The relevant joint data controller agreement can be accessed at the following link: <https://legal.linkedin.com/pages-joint-controller-addendum>.

Under the agreement, LinkedIn ensures:

- information in accordance with Article 13 of the GDPR,
- technical and organizational measures to protect personal data, which you can find in detail at the following link: <https://security.linkedin.com/>.
- the exercise of your rights under the GDPR, which you can exercise by logging into your LinkedIn account at the following link: <https://www.linkedin.com/help/linkedin/ask/cp-master?lang=en>.

Regardless of the joint controller agreement, you have the right to exercise your rights under the GDPR against both LinkedIn and us.

Within the scope of Page Insights, LinkedIn compiles anonymized statistics from the personal data it collects and makes these available to us in aggregated form within the Page Insights feature. We do not receive any personal data through this feature, nor do we have access to the personal data collected and used to compile the statistics.

The legal basis for data processing in relation to Site Analytics is "**Legitimate Interest**" pursuant to Article 6(1)(f) of the GDPR. It is in our legitimate interest to improve the user experience of our Community Site in accordance with the relevant target group.

## 8. Do we transfer your data to third countries?

We do not transfer your personal data to parties outside the European Economic Area (EEA). If we transfer your personal data to parties outside the EEA, we will ensure that the data transfer complies with the requirements of the GDPR by taking appropriate protective measures.

The Office 365 email system provider, Microsoft Ireland Ltd. or the website hosting provider, Amazon Web Services EMEA SARL, as data processors, and Google Ireland Ltd., as the provider of Google Analytics, may transfer personal data to the United States or any other country where Microsoft Corporation, Amazon.com, Inc., Google Ireland Ltd., their affiliates or other data processors operate.

Data transfers are carried out by Microsoft Ireland Ltd., Amazon Web Services EMEA SARL, and Google LLC. in accordance with Chapter V of the GDPR. [Microsoft Corporation](#), [Amazon Web Services, Inc.](#), and [Google LLC](#). are included in the list of countries between the European Union and the United States, which ensures an adequate level of protection of personal data in

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accordance with the European Commission's Implementing Regulation of July 10, 2023.

LinkedIn Ireland, as the provider of the LinkedIn community platform, may also transfer your personal data to third countries, including the United States or any other country where LinkedIn Ireland's affiliates or other data processors operate. LinkedIn is not listed as an active participant in the EU-US Privacy Shield Framework. We can ensure that recipients outside the EEA also provide an adequate level of protection for personal data by entering into data transfer agreements based on standard data protection clauses pursuant to Article 46(2)(c) of the GDPR. Accordingly, we ensure the protection of your personal data by applying data transfer agreements based on the standard data protection clauses set out in the Annex to Commission Implementing Decision 2021/914.

## **9. Automated decision-making, including profiling**

No automated decision-making or profiling is carried out with regard to personal data.

## **10. Your rights**

You have the following rights:

1. **Right of access:** You have the right to obtain confirmation from us as to whether your personal data is being processed and, if so, you have the right to access your personal data.

In order to identify you, we may request additional information from you. If you request additional copies, we may charge you a reasonable fee.

2. **Right to rectification:** You have the right to request that we rectify any inaccurate personal data concerning you without undue delay. In addition, taking into account the purposes of the processing, you have the right to request that we complete your incomplete personal data.
3. **Right to erasure:** You have the right to request the erasure of personal data concerning you.
4. **Right to restriction of processing:** You have the right to request that we restrict the processing of your personal data in certain cases. If your personal data is subject to such restrictions, we may only process your data with your consent, for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a member state.
5. **Right to data portability:** You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and to transmit those data to another controller and to have them transmitted to another data controller.
6. **Withdrawal of consent:** You have the right to withdraw your consent at any time, but the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

**7. Right to object:** You have the right to object to the processing of your personal data at any time for reasons related to your particular situation. In this case, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. If your objection is justified, we will no longer process your personal data for the purposes of the objection.

#### **11. Submitting a complaint, right to legal remedy**

You also have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11.; email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) ; telephone number: +36 (30) 683-5969; +36 (30) 549-6838; +36 (1) 391 1400, website: <https://www.naih.hu/>).

In order to exercise your right to judicial remedy, you are entitled to appeal to the court if you believe that your personal data has been processed in violation of the provisions of the legislation on the processing of personal data or the binding legal acts of the European Union. The court shall hear the case as a matter of priority. The court of jurisdiction shall be the court of the place where you have your habitual residence or place of residence or the court of the place where our company has its registered office (Budapest Metropolitan Court).