

Privacy Statement

Data Protection Statement (Valid from: 01.10.2020)

1. Introduction

Regardless of whether you are a customer, prospective customer, applicant or visitor to our website: We, the Hungarian Water Partnership Nonprofit Ltd. ("we") take the protection of your personal data very important. But, what does this mean in concrete terms?

Below we provide you with an insight into what personal data we collect from you and in what form we process it. Furthermore, you will receive an overview of the rights you are entitled to according to the applicable data protection law. In addition, should you have any questions, we will provide you with a contact person.

1.1 Who are we?

The Hungarian Water Partnership Nonprofit Ltd. is an independent non-governmental and non-profit making organisation. It is dealing with the management of the Hungarian Water Partnership (HWP), a major professional association in Hungary that covers the whole water sector, wastewater as well as drinking water and water related waste.

Members of the HWP are exclusively Hungarian companies and institutions. HWP's strategic, or professional partners can be from foreign countries.

Within the meaning of the applicable data protection laws, as Controller, the

Hungarian Water Partnership Nonprofit Ltd.

Authorised representatives

General Secretary

Managing Director

Mr Attila Sinka

1118 Budapest, Rétköz utca 5., Hungary

E-mail: office@waterpartnership.hu

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We take all measures required by applicable data protection laws to ensure the protection of your personal data.

If you have any questions regarding this data protection statement, please contact Office.

2. Scope of the Data Protection Declaration

With the processing of personal data the legislator means activities such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

Personal data is all the information that relates to an identified or identifiable natural person.

This data protection statement concerns the personal data of customers, interested parties, applicants or visitors.

This data protection statement applies to our website www.hungarianwaterpartnership.com

3. Which personal data do we process?

When you contact us e.g. as an interested party or customer, we collect your personal data. This may happen, for example, if you are interested in our products, register for our online services, contact us via our communication channels or if you use our products or services in the context of existing business relationships.

We process the following types of personal data:

- personal identifiable information (PII), e.g. first and last name, address data, e-mail address, telephone number, fax number
- Contracts' data, e.g. customer number, order number, invoice data
- Company-related data, e.g. company name, department, activity
- Data on your behaviour online, e.g. IP addresses, user names, data on your visits to our website, in the customer portals or in the app, actions carried out on our websites and in the customer portals, place of access
- Information about your interests and wishes, which you communicate to us, e.g. via our contact form or other communication channels
- Information about your professional career, e.g. vocational training, previous employers, other qualifications

and other information comparable to these categories of data.

3.1 Sensitive data

Sensitive data and special categories of personal data such as information on religious or trade union membership, are not collected in this way.

3.2 Use of cookies

What are cookies

Cookies are small text files that are stored in the memory of your end device via your browser. Cookies store certain information (e.g. your preferred language or page settings), which can be sent back to us by your browser when you visit the website again (depending on the lifetime of the cookie).

Which cookies we use

- PHP session cookies

To ensure the operation of the website, we use Matomo as a web analysis service to monitor the server load and to analyze the anonymized usage behavior on the website and in the customer portals. For this analysis, usage information (including the shortened IP address of the user) is transferred to our server and stored for usage analysis purposes. We use the usage analysis to optimize our own websites, customer portals, customer approach and other advertising measures, as well as for market research purposes. The user's IP address is immediately shortened during this process, so that it is no longer possible to identify the user via the IP address.

4. What do we process your personal data for – and on what legal basis?

4.1 Performance of the contract

We process your data in order to fulfil our contracts. This also applies to information that you provide to us in the context of pre-contractual correspondence. The specific purposes of the data processing depend on the respective product and the submitted request and can also be used to analyse your needs and to check which products and services are suitable for you.

4.1.1 Performance of the contractual relationship

For the execution of the contractual relationship we need your name, your address, your telephone number or your e-mail address so that we can contact you.

4.1.2 Offering goods and services

We also need your personal data to be able to check whether and which products and services we can and may offer you.

Details on the respective purposes of data processing can be found in the contractual documents and our General Terms and Conditions of Business.

4.1.3 Carrying out the application process

We process your data that you have sent us as part of your application to check whether your professional qualifications are suitable for the advertised position. We only use your information for the application process and transfer it to your personnel file when a contract is concluded. If no agreement is reached, your information will be deleted or destroyed. We will not use your application information for any other purpose than to conduct the application process.

4.2 Balancing interests: we improve our services and offer you suitable products

4.2.1 For strengthening and optimizing customer relations

As part of our efforts to continually improve our relationship with you, we occasionally ask you to participate in our customer surveys. The results of the surveys serve to adapt our products and services even better to your needs.

4.2.2 Data processing and analysis for marketing purposes

Your needs are important to us and we try to provide you with information about products and services that exactly suit you. For this purpose, we use the findings of our joint business relationship and market research. Our main goal is to adapt our product proposals to your needs. In this context, we guarantee that we always process the data in accordance with applicable data protection law. Important: You can object to the use of your personal data for this purpose at any time.

What exactly do we analyse and process?

- Results of our marketing activities to measure the efficiency and relevance of our campaigns;
- Information from your visits to our website;
- We analyse the possible needs of our products and services.

4.2.3 Newsletter

You have the opportunity to register for our newsletter via our website. For sending it we only need your e-mail address, all other information is voluntary. Only after successful completion of a double opt-in process will you receive our newsletter. At any time, you have the right to view your declaration of consent or to unsubscribe from the newsletter. Corresponding links are implemented in every cover letter to our newsletter. If you unsubscribe from our newsletter, we will immediately delete your contact details from our newsletter distribution list.

The effectiveness of an electronic consent, as it is used for the registration for the newsletter, is subject to certain requirements by law. This also includes recording your declaration of consent. We therefore log the date and time of consent, the text of the declaration of consent, the fact whether the checkbox was selected, your e-mail address and all other voluntary information. We also log the date and time of the click on the confirmation link and on the link in the confirmation e-mail. We collect this information exclusively in order to comply with legal obligations.

4.2.4 Measures to serve your protection

Among others, we use your personal data in the following cases:

- We analyse your data to protect you or your company from fraudulent activities, This may happen, for example, if you have been the victim of identity theft or if unauthorized people have otherwise gained access to your user account;
- Our IT support works closely with you in case of technical problems to improve the reliability of our web applications. In this context, we also evaluate logs of page accesses, actions performed, etc;
- To be able to guarantee IT security;

In order to be able to record and prove facts in the event of possible legal disputes.

4.3 On the basis of your consent

If you have consented to the processing of your personal data for one or more specific purposes, we may process your data. You can withdraw this consent at any time for the future without incurring any costs other than the transmission costs according to the basic tariffs (costs of your Internet connection). However, the withdrawal of consent does not affect the legality of the processing up to the withdrawal.

4.4 Due to legal requirements or in the public interest

As a company, we are subject to a wide variety of legal requirements (e.g. from tax legislation). In order to comply with our legal obligations, we process your personal data.

5. Where we transmit data and why

5.1 Use of data within HWP

Within HWP only those entities that need your personal information in order to fulfil our contractual or legal obligation or to protect our legitimate interest will have access to them.

5.2 Use if data outside HWP

We respect the protection of your personal data and we pass on information about you only if required by law, if you have given your consent or to fulfil contractual obligations.

For the following recipients, for example, there is a legal obligation to pass on your personal data:

- Public authorities or supervisory authorities, e.g. tax authorities, customs authorities;
- Judicial and law enforcement authorities, e.g. police, courts, public prosecutors;
- Lawyers or notaries, e.g. in legal disputes;
- Chartered Accountant/ Auditors.

In order to fulfil our contractual obligations, we cooperate with other companies. These include:

- Transport service providers and freight forwarders;
- Organisers and training service providers, if you have registered through us for certain trade fairs or events;
- Banks and financial service providers to handle all financial matters.
- Our own service providers

In order to make our operations more efficient, we use the services of external service providers who may receive personal data from you for the purposes described, including IT service providers, printing and telecommunications service providers, debt collection, consulting or sales companies.

Important: We pay close attention to your personal data!

In order to ensure that the service providers comply with the same data protection standards as in our company, we have concluded appropriate contracts for order processing. These contracts regulate, among other things:

- that third parties only have access to the data they need to carry out the tasks assigned to them;
- that the service providers only grant access to your data to employees who have explicitly committed themselves to comply with data protection regulations;
- that the service providers comply with technical and organisational measures that guarantee data security and data protection;
- what happens to the data when the business relationship between the service provider and us is terminated.

For service providers based outside the European Economic Area (EEA), we take special security measures (e.g. by using special contractual clauses) to ensure that the data is treated with the same level of caution that is exercised in the EEA. We regularly check all our service providers for compliance with our specifications.

Very important: Under no circumstances do we sell your personal data to third parties!

6. Are you obliged to provide us with personal data?

In the context of the business relationship between you and HWP, we require from you the following categories of personal data:

- all necessary data for the establishment and implementation of a business relationship;
- data required for the fulfilment of contractual obligations;
- data that we are legally obliged to collect.

Without these data it is not possible for us to enter into or execute contracts with you.

7. Delegation periods

In accordance with the applicable data protection regulations, we do not store your personal data longer than we need for the purposes of the respective processing. If the data is no longer required for the fulfilment of contractual or legal obligations, it will be regularly deleted by us, unless its temporary storage is still necessary. There may be the following reasons for further storage:

- Obligations under commercial and tax law to retain data must be observed: The periods for storage, primarily in accordance with the provisions of the Commercial Code and the Fiscal Code, are up to 10 years.
- To obtain evidence in the event of legal disputes within the framework of statutory limitation periods: in civil law, statutory limitation periods may be up to 30 years, with the regular limitation period occurring after three years.

8. Your rights

Within the scope of processing your personal data, you also have certain rights. More detailed information can be found in the corresponding provisions of the General Data Protection Regulation (Articles 15 to 21).

8.1 Right to information and correction

You have the right to obtain information from us on which of your personal data we process. If this information is not (no longer) correct, you can ask us to correct the data, or, if it is incomplete, to complete it. If we have passed on your data to third parties, we will inform the relevant third parties in the event of a corresponding legal situation.

8.2 Right to deletion

You can request the immediate deletion of your personal data under the following circumstances:

- When your personal information is no longer needed for the purposes for which it was collected;
- If you have revoked your consent and there is no other legal basis for data processing;
- If you object to the processing and there are no overriding legitimate reasons for data processing;
- If your data is processed unlawfully;
- If your personal data must be deleted in order to comply with legal obligations.

Please note that before deleting your data we must check whether there is not a legitimate reason for processing your personal data.

8.3 Right to restriction of processing („Right to Block“)

You may request us to restrict the processing of your personal data for one of the following reasons:

- If you dispute the accuracy of the data until we have had the opportunity to verify the accuracy of the data;
- If the data is processed unlawfully, but instead of being deleted, you merely request the restriction of the use of personal data;
- If we no longer need the personal data for the purposes of processing, but you still need them to assert, exercise or defend in the course of legal claims;
- If you have filed an objection against the processing and it is not yet clear whether your legitimate interests outweigh ours.

8.4 Right to object

8.4.1 Right of objection in individual cases

If the processing is carried out in the public interest or on the basis of a balance of interests, you have the right to object to the processing for reasons arising from your particular situation. In the event of an objection, we will not process your personal data further, unless we can prove compelling reasons for processing your data, which outweigh your interests, rights and freedoms, or because your personal data serve to assert, exercise or defend legal

claims. The objection shall not preclude the legality of the processing carried out up to the time of the objection.

8.4.2 Object againsts the use of data for advertising purposes

In cases where your personal information is used for advertising purposes, you can object to this form of processing at any time. We will no longer process your personal information for these purposes.

The objection can be made form-free and should be addressed to:

Address: 1118 Budapest, Rétköz utca 5.,

Phone:+36-1-224-0670

E-mail: office@waterpartnership.hu Website: www.hungarianwaterpartnership.com

8.5 Right to data portability

Upon requests, you have the right to receive personal data that you have given us for processing in a transferable and machine-readable format.

8.6 Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)

We try to process your requests and claims as quickly as possible in order to protect your rights appropriately. Depending on the frequency of enquiries, however, it may take up to 30 days before we can provide you with further information about your request. If it should take longer, we will inform you promptly of the reasons for the delay and discuss the further process with you.

In some cases we may not or cannot give you any information. If legally permissible, we will inform you of the reason for refusing to disclose the information.

However, should you not be satisfied with our answer and responses or should you be of the opinion that we are violating the current data protection law, you are free to file a complaint with HWP as well as the relevant supervisory authority. The supervisory authority responsible for us is: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information) www.naih.hu ugyfelszolgalat@naih.hu

Version

This Data Protection Statement is valid as of 01.10.2020. Registered customers will be informed about changes in the Data Protection Statement.