DATA PROTECTION NOTICE

CUSTOMERS' PERSONAL DATA

2021.

Medical cart Company Kft / M.C.C.Kft /as data controller sell goods and provides services for its customers. This economic activity make the processing of personal data necessary. M.C.C Kft also has a web page and some minimal data processing occurs through the operation of the web page as well. We hereby introduce how we process personal data. Should you have any question, please do not hesitate to contact us.

Data processing occurs as follows:

A. MEDICAL CART COMPANY KFT AS DATA CONTROLLER IN NUTSHELL

Name:	Medical Cart Company Kft.
Seat:	2051 Biatorbágy, Vendel Park, Tormásrét u. 12.
Registry Number:	Cg.13-09-197330
Tax Number:	25790083-2-13
Represented by:	John William Gough, Purger Hajnalka managing directors info@rcare.hu
Web Page:	www.rcare.hu

B. DATA PROCESSING ACTIVITIES

WWW.RCARE.HU WEB PAGE

Medical cart Company Kft has a web page and it processes minimal amount of personal data connected to this web page.

Medical Cart Company Kft contracted with a **web hosting service provider**, which operates as data processor.

M.C.C. Kft's web page contains some **cookies**, which also translates into some minimal data processing activities.

Finally, M.C.C.Kft receives email at its **email addresses** such as info@rcare.hu, and processes personal data contained in those emails. Data processing occurs as follows:

WEB HOSTING SERVICE PROVIDER

NAME	PLANUM-COMP Számítástechnikai Szolgáltató és Fejlesztő Kft.
SEAT	1151 Budapest, Szlacsányi F u. 198.
REGISTRY NUMBER	Cg.01-09-706236
CONTACT	bsandor@planumcomp.hu

The web hosting service provider also provides email services to M.C.C. Kft and deems in both capacity as data processor. The data processor is acting on behalf and at the instructions of the data controller M.C.C Kft. This means that the data processor is not entitled to use personal data for own purposes. The data controller and data processor made a data processing agreement according to Art.28 of GDPR.

COOKIES: WWW.RCARE.HU

The web page of M.C.C. Kft minimally collects personal data regarding the visitor of the web page. Such data processing is partly necessary for the proper functioning of the web page, partly to see statistical data regarding the visitors. Such personal data tend to provide statistics regarding the visitors of the web page. The legal basis for data processing for those cookies which are necessary for the proper operation of the web page is the legitimate interest of the data controller. Other cookies may be used only with the prior consent of the visitors. Visitors may check the cookies on their devices anytime and may delete them if they wish.

The following cookies will be used when visiting the web page:

NAME	FUNCTION	DURATION	TYPE	LEGAL BASIS
PHPSESSID (webserver, www.rcare.hu)	Provides for the proper functioning of the web page during browsing.	Session	Necessary to browsing.	Legitimate interest of the data controller.
_utm.gif (Google Analytics, USA)	Collects personal data regarding the web browser and computer of the visitor.	Session	Statistics	Prior consent of the data subject.
_utma (Google Analytics, USA)	Collects data on the number of times a user has visited the web page as well as the dates for the first and most recent visits.	2 years	Statistics	Prior consent of the data subject.
_utmb (Google Analytics, USA)	Registers the exact time when the user accessed the web site.	1 day	Statistics	Prior consent of the data subject.
_utmc (Google Analytics, USA)	Registers the exact time when the user leaves the web site.	Session	Statistics	Prior consent of the data subject.
_utmt (Google Analytics, USA)	Used to throttle the speed of requests to the server	1 day	Statistics	Prior consent of the data subject.
_utmz (Google Analytics, USA)	Collects data on where the user came from, what search engine was used, what link was clicked, what search term was used.	6 months	Statistics	Prior consent of the data subject.
hirdetes_cookie **Hungarian cookie**	webserver cookie	1 day	Marketing	Prior consent of the data subject.

Services offered by Google Analytics deem data transfer to a third country. Google was a Privacy Shield member until it was considered a guarantee of safe data tranfer by the European Union.

https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI

Data protection notice of Google can be found here:

https://support.google.com/analytics/answer/7105316?hl=en&ref_topic=2919631

Google applies Model Contract Clauses of the European Commission.

GENERAL INQUIRIES: EMAILS TO INFO@RCARE.HU, OTHER EMAIL ADDRESSES

M.C.C. Kft sells products and offers services. Relating to its business activities, It receives emails at its email addresses like info@rcare.hu.

If M.C.C. Kft receives an email, it processes personal data contained in this email message. If this email is connected to an ongoing business transaction, please read the section called „Fulfillment of Contracts".

Data processing related to general inquiries are as follows:

Purpose of data processing:	Answering general inquiries, making contact, giving an offer.
Legal basis of data processing:	The **fulfillment of a contract** relying on Art.6 (1) (b) of GDPR. Should no contractual relationship between the parties develop, personal data will be deleted within 6 monts.
Legitimate interest, if any:	The legal basis is not legitimate interest.
Categories of data subjects:	Natural persons, representatives or contacts of legal persons (enterprises) sending general inquiries to M.C.C. kft.
Categories of personal data:	Email address, name of the data subject, personal data in the email.
Source of personal data:	The data subject is the source of personal data.
Duration of data processing:	M.C.C. Kft processes personal data for **6 months**. If no contractual relationship develops, personal data will be deleted.
Data Transfer Recipients:	**PLANUM-COMP Számítástechnikai Szolgáltató és Fejlesztő Kft.** (1151 Budapest, Szlacsányi F. u. 198., Cg.01-09-706236) as **IT, email and server provider** may have access to personal data. This service provider operates as data processor tha is, it is acting on belahf of and at the instruction of M.C.C.Kft. No further data transfer occurs.
Data Transfer to Third Country:	No data transfer to a third country occurs.
Automated decisionmaking, profiling:	No automated decisionmaking/profiling occurs.
Is the provision of personal data mandatory:	The provision of personal data is not mandatory.
Consequences of not providing personal data:	If M.C.C.Kft does not have personal data, it may not be able to answer to the inquiries.

DATA PROCESSING RELATING TO FULFILLMENT OF A CONTRACTS

RCARE sells goods and provides services and processes personal data in connnection to such contractual relationships. Such personal data are necessary to the fulfillment of the contract. Data processing occurs as follows:

The purpose of data processing:	**Fulfillment of contracts, contacting, enforcement of claims during the duration of the contractual relationship, enforcement of claims during the statute of limitation, invoicing.**
The legal basis of data processing:	The **fulfillment of a contract** relying on Art.6(1)(b) of GDPR regarding personal data, which are necessary to the fulfillment of the contract.
	If a legal dispute develops between the parties, the legal basis of data processing is the **legitimate interest** of the data controller. If the contract has been fulfilled or its duration expired, the legal basis of data processing during the statute of limitation period (5 years) is the legal basis of the data controller relying on Art.6.(1)(f) of GDPR. Legitimate interest is the legal basis for processing of contact data as well.
	What invoicing is concerned, the legal basis of data processing is **legal requirement** Art.6.(1)(c). The basis of such data processing is §159, §169 of the law Nr. CXXVII. of 2007. and §166-169 of the law Nr. C. of 2000 (law of finances).
Legitimate interest if any:	Proving claims in a **legal dispute** is a legitimate interest.
	In addition, parties may raise claims against each other during the **statute of limitation period** (e.g. nonconforming performance). The interest of the data controller is the establishment of set of facts, the ability to prove set of facts, the detection of violation of law. Finally, the processing of contact data is also legitimate interest of the parties.
	The contracting party can **foresee data processing,** the existence of documents and personal data assist both parties in asserting a claim or contacting the other party.
	Both parties are interested in establishing and proving set of facts in a dispute and maintaining contact data.
	During the duration of a legal dispute and the statute of limitation period, M.C.C. Kft processes personal data for such purposes only and **stores such data separated.**
Categories of data subjects:	Natural persons, enterpreneurs, legal persons having a contractual relationship with M.C.C. their contacts and representatives.

Categories of personal data:	**Natural person:** name, address, contact data (phone, email address). **Enterpreneur:** see natural person plus tax number and registry number. **Legal person:** name, phone number and email address of its representative and contact, if any.
Source of personal data:	The data subject is the source of personal data.
Duration of data processing:	Personal data processed on the legal groung of the **fulfillment of a contract** are processed during the duration of the contract. Then, such personal data are process on the legal ground of **legitimate interest** of M.C.C. Kft during the statute of limitation period (5 years). Personal data processed on the basis of **legal requirement** (documents required to prove proper invoicing, the fulfillment of tax duties etc.) are processed for 8 years following the year in which the invoice has been issued.
Data transfer recipients:	**CRIAND Tanácsadó Kft.** (1023 Budapest, Komjádi Béla u. 1., II.em.5., Cg.01-09-356913, konyveles@aixkft.hu): **as accounting service provider.** The service provides act on behalf and at the instruction of M.C.C. Kft, it does not personal data for own purpose. **KBOSS.hu Kft.** (1031 Budapest, Záhony u. 7., Cg.01-09-303201, info@szamlazz.hu) as **invoicing service provider** (Számlázz.hu program) as data processor. **PLANUM-COMP Számítástechnikai Szolgáltató és Fejlesztő Kft.** (1151 Budapest, Szlacsányi F. u. 198., Cg.01-09-706236) as **IT, email and server provider** may have access to personal data. This service provider operates as data processor tha is, it is acting on belahf of and at the instruction of RCARE. No further data transfer occurs.
Data transfer to a third country:	No data transfer to a third country occurs.
Automated decisionmaking/profiling:	No automated decisionmaking/profiling occurs.
Is the provision of personal data mandatory:	The provision of personal data is not mandatory.
Consequences of not providing personal data:	If M.C.C. Kft does not have personal data, it may not be able to fulfil contractual duties or rights.

DATA PROCESSING RELATED TO EXTERNAL PARTNERS ASSISTING RCARE IN ITS BUSINESS ACTIVITY

Medical Cart Company Kft hires external contracctual partners to assist in its business activity. Through this relationship with external partners, M.C.C Kft is processing personal data of such external partners.

Data processing occurs as follows:

Purpose of data processing:	Fulfillment of contracts with external partners, contacting, enforcement of claims during the duration of the contractual relationship, enforcement of claims during the statute of limitation, invoicing.
Legal basis of data processing:	The **fulfillment of a contract** relying on Art.6(1)(b) of GDPR regarding personal data, which are necessary to the fulfillment of the contract. If a legal dispute develops, the legal basis of data processing is the **legitimate interest** of the data controller. If the contract has been fulfilled or its duration expired, the legal basis of data processing during the statute of limitation (5 years) is the legal basis of the data controller relying on Art.6.(1)(f) of GDPR. Legitimate interest is the legal basis for processing of contact data. What invoicing is concerned, the legal basis of data processing is **legal requirement** Art.6.(1)(c). The basis of such data processing is §159, §169 of the law Nr. CXXVII. of 2007. and §166-169 of the law Nr. C. of 2000 (law of finances).
Legitimate interest if any:	Proving claims in a **legal dispute** is a legitimate interest. In addition, parties may raise claims against each other during the **statute of limitation period** (e.g. nonconforming performance). The interest of the data controller is the establishment of set of facts, the ability to prove set of facts, the detection of violation of law. Finally, the processing of contact data is also legitimate interest of the parties. The contracting party can **foresee data processing,** the existence of documents and personal data assist both parties in asserting a claim or contacting the other party. **Both parties are interested in** establishing set of facts in a dispute and maintaining contact data. During the duration of a legal dispute and the statute of limitation period, M.C.C. Kft processes personal data for such purposes only and **stores such data separated.**
Categories of data subjects:	Natural persons, enterpreneurs, legal persons having a contractual relationship with M.C.C Kft as

	external partners, their contacts and representatives.
Categories of personal data:	**Natural person:** name, address, contact data (phone, email address). **Enterpreneur:** see natural person plus tax number and registry number. **Legal person:** name, phone number and email address of its representative and contact
Source of personal data:	The data subject (external partner) is the source of personal data with the exception of email address and phone number (if any) provided by M.C.C. Kft to the external partner.
Duration of data processing:	Personal data process on the legal groung of the **fulfillment of a contract** are processed during the duration of the contract. Then, such personal data are process on the legal ground of **legitimate interest** of M.C.C. Kft during the statute of limitation period (5 years). Personal data processed on the basis of **legal requirement** (documents required to prove proper invoicing, the fulfillment of tax duties etc.) are processed for 8 years following the year in which the invoice has been issued.
Data transfer to recipients:	**CRIAND Tanácsadó Kft.** (1023 Budapest, Komjádi Béla u. 1., II.em.5., Cg.01-09-356913, konyveles@aixkft.hu): **as accounting service provider.** The service provides act on behalf and at the instruction of M.C.C Kft, it does not personal data for own purpose. **KBOSS.hu Kft.** (1031 Budapest, Záhony u. 7., Cg.01-09-303201, info@szamlazz.hu) as **invoicing service provider** (Számlázz.hu program) as data processor. **PLANUM-COMP Számítástechnikai Szolgáltató és Fejlesztő Kft.** (1151 Budapest, Szlacsányi F. u. 198., Cg.01-09-706236) as **IT, email and server provider** may have access to personal data. This service provider operates as data processor tha is, it is acting on belahf of and at the instruction of M.C.C. Kft. No further data transfer occurs.
Data transfer to third country:	No data transfer to a third country occurs.
Automated decisionmaking/profiling:	No automated decisionmaking/profiling occurs.
Is the provision of personal data mandatory:	The provision of personal data is not mandatory.
Consequences of not providing personal data:	If M.C.C. Kft does not have personal data, it may not be able to fulfil contractual duties or rights.

C. CONTENTS OF THIS NOTICE, APPLICABLE LAWS AND REGULATION

1. CONTENTS OF THIS NOTICE
Data contollers are required to provide information for data subject about the processing of personal data. Such notice shall be conscize, clear and easily accessible. **This notice introduces the most important aspects of data processing** activities pursued by M.C.C.Kft keeping in mind simplicity as a requiremet. Should you have any question, please do not hesitate to contact M.C.C. kft's managing director, who is in charge of providing information on data processing.

2. LAWS TO BE APPLIED, INTERPRETATION TO BE FOLLOWED
Please find attached most important rules and regulations including interpretations, which shall be followed by M.C.C. Kft as data controller:

-General Data Protection Regulation (regulation Nr.2016/679: **GDPR**)
-Data Protection Act, Hungary (Law on Data Protection Nr. CXII. of 2011., „**Infotv.**")

INTERPRETATION TO BE FOLLOWED
-European Data Protection Board (https://edpb.europa.eu)
-European Data Protection Supervisor (https://edps.europe.eu)

-Decisions of the Hungarian Data Protection Authority
-Luxemburg Court (https://curia.europe.eu)
-Data Protection Authorities of the Member States

D. TERMS IN THIS NOTICE

Please find bellow the most important terms used by GDPR and applied by RCARE:

'**Personal data**' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

'**Special categories of personal data**' means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

'**Criminal data**' means personal data relating to criminal convictions and offences or related security measures.

'**Processing**' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, 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.

'**Restriction of processing**' means the marking of stored personal data with the aim of limiting their processing in the future.

'**Profiling**' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict

aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

'**Pseudonymisation**' means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

'**Filing system**' means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

'**Controller**' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

'**Processor**' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

'**Recipient**' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

'**Third party**' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

'**Consent**' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

'**Personal data breach**' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

'**Genetic data**' means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

'**Biometric data**' means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

'**Data concerning health**' means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

'**Enterprise**' means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;

'**Group of undertakings**' means a controlling undertaking and its controlled undertakings;

'**Supervisory authority**' means an independent public authority which is established by a Member State pursuant to Article 51.

E. PRINCIPLES OF DATA PROCESSING

Principles to be followed during the processing of personal data are as follows:

1. Personal data shall be:

(a) processed lawfully, fairly and in a transparent manner in relation to the data subject (**'lawfulness, fairness and transparency'**);

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (**'purpose limitation'**);

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('**data minimisation'**);

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('**accuracy**');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('**storage limitation'**);

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('**integrity and confidentiality'**).

The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('**accountability**').

F. WE PROTECT YOUR PERSONAL DATA THIS WAY

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

(a)   the pseudonymisation and encryption of personal data;

(b)   the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;

(c)   the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;

(d)   a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

SECURITY OF PAPER BASED DATA PROCESSING

Medical Cart Company Kft applies the following security measures to protect paper based data processing:

a.) personal data can be seen and accessed only by authorized persons, no one else is able to see or access them

b.) paper based documents belonging to active customer relationships are accessible only by those who perform work on those files

c.) employees and other persons participating in data processing may leave the office room or office building only if they securely place data carrier and documents or close the office room/office building

d.) after finishing the work, documents will be stored in a locked storage place

SECURITY OF DIGITIZED DATA

Medical cart Company make the following security steps to protect personal data stored on a comuter or network (server):

a.) Computers are owned by M.C.C. Kf or M.C.C. Kft possesses similar rights regarding such equipments

b.) Personal data on computers are accessible only by valid, personal user name and password, which are changed on a regular basis

c.) Antivirus protection has been applied

d.) Medical Cart Company Kf prevents unauthorized access to personal data stored electronically

G. DATA SUBJECTS' RIGHTSD

ata subjects enjoy various rights as follows:

-right to information including information on automated decision making and profiling

-right to access to personal data

-right to erasure of personal data

-right to restriction of data processing

-right to correction of personal data

-right of portability

-right to protest against data processing

H. REMARKS, QUESTIONS AND COMMENTS

If you have any remark, question or comment, feel free to contact M.C.C. Kft in writing or via email as follows:

Name:	Purger Hajnalka
Position	managing director
Postal address:	2051 Biatorbágy, Vendel Park, Tormásrét u. 12.
E-mail	hajnalka.purger@medicalcartcompany.hu

You may also contact the Hungarian Data Protection Authority: Address: 1530 Budapest, Pf.: 5., phone: +36 (1) 391-1400, email: ugyfelszolgalat@naih.hu, web page: www.naih.hu) or turn to the competent court.