

## Privacy Policy for Business Partners

**IDBC Creative Solutions Kft., IDBC New Tech Kft., and IDBC GO Kft.** are engaged in providing human resources management and IT services related to business process management. Given that the target groups and business partners of the three companies are different, but the provision of services (searching for potential partners, contracting, fulfillment, etc.) mostly follows the same methodology, **the three companies have concluded a joint data controller agreement.**

The essence of the joint data controller agreement is that IDBC Creative Solutions Kft., IDBC New Tech Kft., and IDBC GO Kft. jointly provide and operate the services belonging to their scope of activities (e.g., sales, customer relations).

The preparation and updating of the privacy policy for business partners, the handling of potential data breaches and reporting them to the data protection supervisory authority as necessary, as well as the exercising of data subject rights, are carried out with the cooperation of IDBC Creative Solutions Kft. If any data protection-related activity (e.g., modifying the privacy policy, contacting data subjects) affects the activities of IDBC New Tech Kft. and/or IDBC GO Kft., IDBC Creative Solutions Kft. acts after consulting with the Parties or the affected Party.

IDBC Creative Solutions Kft., IDBC New Tech Kft., and IDBC GO Kft. (hereinafter collectively: **IDBC** or **Data Controller**) come into contact with natural persons, legal entities, and organizations without legal personality during their business activities. Legal entities and organizations without legal personality are referred to as "business partners".

In this Privacy Policy, we have summarized the information (purpose, legal basis, and duration of data processing, the scope of personal data processed, etc.) concerning the processing of personal data related to establishing contact with business partners, cooperating with our existing business partners, and IDBC's business activities (provision of its services).

Concepts related to the processing and protection of personal data:

- a) the subject of the personal data (e.g., a natural person representing or affiliated with a business partner) as the data subject (hereinafter: data subject),
- b) any information relating to the data subject as personal data,
- c) any operation performed on personal data (collection, recording, storage, processing, consultation, transmission, retrieval, viewing, disclosure, etc.) as data processing,
- d) the authorization for data processing as the legal basis of data processing,
- e) the decision-maker regarding the purposes and means of data processing as the data controller,
- f) those who do not belong to the data controller but participate in data processing operations based on a written agreement as data processors,
- g) a person other than the data subject, the data controller, and the data processor is called a third party;

therefore, we use these terms in the Privacy Policy.

You can read our privacy policy for candidates (job applicants) related to cooperation for job searching and recruitment purposes [here](#).

Employees working at IDBC (including our subcontractors) receive the information on the processing of their personal data before signing their employment or subcontractor contract.

You can find our privacy policy regarding the processing of personal data occurring during IDBC's marketing activities (social media pages, website cookies, webinars, etc.) [here](#).

This Privacy Policy also contains the data protection, legal enforcement, and remedy rights of natural persons affected during cooperation with business partners (see Section 8).

## 1. Names and Contact Details of Data Controllers

### Data Controller 1: IDBC Creative Solutions Kft.

Headquarters and postal address: 1138 Budapest, Népfürdő u. 22. Duna Tower Irodaház A torony 13. emelet

Registering authority: Company Registry Court of the Budapest Metropolitan Court

Company registration number: 01-09-192925

Tax number: 24983332-2-41

Recruitment agency license number: BPM/0701/597-1/2016-1012

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Website: <https://idbc.hu>

Data Protection Officer contact: adatvedelem@idbc.hu

### Data Controller 2: IDBC New Tech Kft.

Headquarters and postal address: 1138 Budapest, Népfürdő u. 22. Duna Tower Irodaház A torony 13. emelet

Registering authority: Company Registry Court of the Budapest Metropolitan Court

Company registration number: 01-09-861417

Tax number: 13556075-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Data Protection Officer contact: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

### Data Controller 3: IDBC GO Kft.

Headquarters and postal address: 1138 Budapest, Népfürdő u. 22. Duna Tower Irodaház A torony 13. emelet

Registering authority: Company Registry Court of the Budapest Metropolitan Court

Company registration number: 01-09-283268

Tax number: 25578182-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Data Protection Officer contact: adatvedelem@idbc.hu

## 2. Important Legislation Regarding Data Processing

- a) Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR or General Data Protection Regulation),
- b) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act),
- c) Act V of 2013 on the Civil Code (Civil Code),
- d) Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities (Advertising Act),

- e) Act CVIII of 2001 on certain issues of electronic commerce services and information society services (E-commerce Act),
- f) Act XXV of 2023 on complaints, public interest disclosures, and rules related to reporting abuses (Whistleblowing Act),
- g) Act C of 2000 on Accounting (Accounting Act).

### 3. Activities Involving the Processing of Personal Data

#### 3.1. Preparation and Performance of a Business Service Contract

IDBC concludes contracts to provide or utilize services. Contact is initiated with the prospective business partner either by IDBC or by the prospective business partner.

During the preparation of the contract (contacting, negotiation, etc.) and the conclusion of the business contract, we process the name, and if applicable, the title, job position, e-mail address, phone number of the natural person representing the business partner, as well as the name of the business partner, and information related to the requested service (subject of the contract, or content and start date of the service, etc.).

Data processing related to contracts concluded by IDBC includes, in addition to the name, the business partner's headquarters, tax number, and company registration or registry number, which only qualify as personal data together with information concerning a natural person (e.g., name and job position).

Legal basis for data processing: GDPR Article 6 (1) point b) – preparation and performance of a contract.

Retention period of personal data:

- a) based on Section 6:22 of the Civil Code, 5 years from the termination of the contract (general limitation period);
- b) if no order or contract conclusion occurs following the request for quotation or the provision of a quotation, we will delete the personal data 1 year after the business quotation is provided or after the last contact (e.g., telephone inquiry).

For data processing regarding contact maintenance related to the preparation (quoting) and performance of the contract, see Section 3.3.

#### 3.2. Data Processing Related to Invoicing

IDBC issues an invoice - in accordance with legal regulations - for the assignment fee requested or received for services performed based on the contract.

The invoice contains the business partner's name, headquarters or billing address, tax number, service details (name, quantity, or duration, etc.), and its consideration, as well as tax-related information (tax rate, etc.). In this case, the name of a sole proprietor business partner is not personal data, but acts as a "company name".

In connection with invoicing, we also process the personal data (name, e-mail address, or mailing address) necessary for forwarding the invoice to the addressee (business partner). Personal data only appears on the invoice if the business partner explicitly requests (in writing) the inclusion of the name or other personal data (e.g., personalized e-mail address, personal phone number) of the natural person representing or affiliated with them. In this case, it is the business partner's responsibility to inform the data subject about the processing of their personal data.

Legal basis for data processing: GDPR Article 6 (1) point c) – fulfilling a legal obligation according to the VAT Act and the Accounting Act.

Duration of data processing: 8 years from the fulfillment of the invoice based on Section 169 (1) of the Accounting Act.

### 3.3. Data Processing Related to Contact Keeping Necessary for the Preparation and Performance of the Business Service Contract

A natural consequence of preparing and performing business service contracts (and an expected behavior based on the Civil Code) is providing various pieces of information, answering questions, and handling potential problems, i.e., continuous cooperation and communication between the contracting parties, which could not be accomplished without processing the personal data (e.g., name, job position, e-mail address, phone number, name of the business partner, content of communication) of the business partner's representative and/or contact person.

In addition to the previously mentioned personal data of the business partner's representative and/or contact person, we also process the business partner's name, headquarters and/or mailing address, central phone number, and e-mail address.

Legal basis for data processing: GDPR Article 6 (1) point f) – IDBC's legitimate interest in preparing and performing the contract.

Duration of data processing:

- a) Based on Section 6:22 of the Civil Code, 5 years from the termination of the contract or the completion of the contact task (general limitation period);
- b) If no order or contract conclusion occurs following the request for quotation or the provision of a quotation, we will delete the personal data 1 year after the business quotation is provided or after the last contact (e.g., telephone inquiry).

### 3.4. Data Processing Related to Complaints

We define a complaint as the expression of grievance, inconvenience, or dissatisfaction regarding behavior experienced during cooperation or administration with IDBC.

The complaint may also contain a suggestion. You can contact us using the contact details in Section 1 with complaints regarding IDBC's services or the administration carried out during cooperation with business partners. In order to remedy the complaint as soon as possible, we process the complainant's name, identification data (if necessary), contact details (e.g., e-mail address), and information regarding the complaint (subject, time, duration, etc.).

If IDBC has doubts about the identity of the complainant, it may request the provision of further identifying data. If the data subject does not provide the personal data strictly necessary for handling the complaint, IDBC will reject the complaint—stating the reason.

Legal basis for data processing: GDPR Article 6 (1) point c) – fulfilling a legal obligation according to the Whistleblowing Act.

Duration of data processing: 5 years from the completion of the handling of the complaint (general limitation period).

### 3.5. Enforcement of Claims Related to the Business Service Contract

In the event of legal and/or business claims (e.g., non-payment of assignment fee, causing damage) related to the service performed or to be performed by it or related to the business service contract, IDBC processes the following personal data of the business partner, regardless of which party submits the claim: the name, job position, business contact details (e.g., e-mail address, phone number) of the business partner's representative or other affiliated natural person, and information related to the legal and/or business claim (e.g., name, content, time of the claim).

In addition to the previously mentioned personal data of the business partner's representative, we also process the business partner's name, headquarters and/or mailing address, and the phone number and e-mail address linked to the central or organizational unit.

Legal basis for data processing: GDPR Article 6 (1) point f) – IDBC's legitimate interest in the enforcement of claims related to the business service contract.

Retention period of personal data: 5 years from the performance of the contract based on Section 6:22 of the Civil Code (general limitation period).

### 3.6. [Data Processing Related to Exercising the Data Subject's Rights and Complaints Regarding Personal Data Processing](#)

The data subject may exercise their rights set out in Chapter 8 during all data processing activities carried out by IDBC, and may file a complaint regarding the processing of their personal data with the Data Controller or exercise their right to legal remedy as described in Chapter 9.

Data subject rights are personal rights that can only be exercised personally. The term "exercised personally" means that these rights can be exercised by the person to whom the personal data related to the exercise of the right or the data processing activity affected by the privacy complaint relates.

The full processing of the data subject's personal identification data (name, place and date of birth, mother's name) only takes place if the data subject right cannot be exercised without providing these data, or the complaint regarding data processing cannot be evaluated.

If the exercise of the data subject right or the privacy complaint adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse the fulfillment of the data subject's request to the necessary and proportionate extent or to give a restricted response.

If the problem related to the processing of personal data can be linked to the activities of contributors involved in IDBC's business activities, the given contributor is responsible for the procedure (see: Chapter 5). In the case of a privacy complaint or the exercise of data subject rights concerning data processors, IDBC will act if the privacy complaint or the exercise of the data subject right concerns the data processing activity requested by IDBC.

IDBC may involve the data processor in the investigation of a privacy complaint or data subject right concerning the data processing activity requested by it, and for this purpose, it may transfer the personal data of the data subject under this section to the data processor, provided this does not violate the rights and freedoms of the data subject. In order to ensure the exercise of data subject rights and handle privacy complaints (receiving, evaluating, etc.), IDBC processes the data subject's personal data [name, data related to the exercise of the data subject right (topic, time, data related to fulfillment)].

Legal basis for data processing: GDPR Article 6 (1) point c) – fulfilling a legal obligation according to GDPR Article 12 (5) and (6), Articles 15-18, Article 21.

Retention period of personal data: 5 years from the fulfillment of the exercise of the data subject right (from the closure of the case) (general limitation period).

If the exercise of the data subject's rights or the handling of the privacy complaint entails an official or court procedure, the duration of data processing under this section lasts until the retention period of the documents of the official or court procedure.

### 3.7. [Operation of Cameras](#)

The cameras installed at IDBC's headquarters operate with a viewing angle covering the entrance to the headquarters, the reception and the lobby in front of it, as well as the two corridors in front of the office and meeting rooms.

The purpose of camera surveillance is the protection of human life and physical integrity, as well as IDBC's property (including trade secrets and personal data), and the investigation of potential unauthorized intrusion.

The cameras record the data subject's image, behavior, and the location and time of their movement. The cameras do not record sound, and they are not connected to a computer system that automatically identifies the data subject based on their face or other physical characteristics. Legal basis for data processing: GDPR Article 6 (1) point f) – IDBC's legitimate interest in protecting human life and physical integrity, protecting its property, investigating potential unauthorized intrusion, and ensuring undisturbed operation.

Retention period of personal data: 30 days from the creation of the data; in the event of a procedure, until the end of the retention period of the documents of the procedure.

#### 4. Profiling, Automated Decision-Making

IDBC does not apply profiling (grouping, evaluation according to a certain characteristic, etc.) using the personal data it processes, nor does it apply automated decision-making based on this (a decision made exclusively by automated means affecting the data subject, or the computerized preparation of such a decision).

#### 5. Access to Data, Data Transfer

IDBC also uses the services of contributors during the provision of its services. Some of the contributors (e.g., platform providers) qualify as data controllers, while others qualify as data processors (for data processors, see Chapter 6).

IDBC may occasionally transfer personal data to the National Authority for Data Protection and Freedom of Information, which performs data protection supervision, or to other authorities or courts for their proceedings.

Based on legal requirements, the National Tax and Customs Administration (headquarters: 1054 Budapest, Széchenyi utca 2., website: [www.nav.gov.hu](http://www.nav.gov.hu), privacy policy: <https://nav.gov.hu/footer-tartalom/adatvedelem>) also receives the invoices issued by IDBC.

Service providers qualifying as data controllers act as contributors in the following activities:

##### 5.1. Electronic Data Processing

With a business subscription, IDBC uses the Microsoft 365 and Microsoft Teams services of Microsoft Ireland Operations Limited (Headquarters: Ireland, Dublin 18, Leopardstown, South County Business Park, One Microsoft Place, privacy policy: [Microsoft Privacy Statement - Microsoft Privacy Practices](#)).

##### 5.2. Bookkeeping, Auditing

Tasks related to bookkeeping and accounting for IDBC are performed by EGM Adó-kontír Kft. (Headquarters: 1116 Budapest, Talpas u. 3.; company registration number: 01-09-666553; tax number: 12313464-2-43).

IDBC's business operation is audited by Petrovics és Társa Könyvvizsgáló, Adótanácsadó és Számviteli Szolgáltató Betéti Társaság (Headquarters: 1141 Budapest, Szederkény utca 3., company registration number: 01 06 110388, tax number: 28171966-2-42).

##### 5.3. Paper-based Correspondence, Parcel Delivery

During written communication and administration with its business partners, IDBC uses the services of Magyar Posta (Headquarters: 1138 Budapest, Dunavirág utca 2-6., company registration number: 01 10 042463, tax number: 10901232-2-44, privacy policy: [https://www.posta.hu/adatkezelesi\\_tajekoztato](https://www.posta.hu/adatkezelesi_tajekoztato)).

During communication and administration with its business partners, IDBC also uses the services of Gepárd Express Kft. (Headquarters: 2636 Tésa, Kossuth utca 70., company registration number: 13-09-209821, tax number: 28984768-2-13).

## 6. Data Processors

Under the GDPR, business partners that perform data processing operations related to IDBC's services based on IDBC's written mandate (contract), and thus have access to personal data, qualify as data processors.

IDBC includes and verifies the requirement in its contracts with data processors that the employees of the contributing data processor business partner may only access the personal data related to IDBC's services exclusively to perform their tasks and to the extent necessary for that purpose, following data protection and data management training, as well as an assumption of responsibility.

Data processors may not make decisions related to data processing (e.g., for what purpose, what personal data to process, for how long), they are exclusively entitled to act and perform specified data processing operations (e.g., collection, analysis, transmission, erasure) according to the contract concluded with IDBC and the instructions received.

IDBC only uses data processors that implement appropriate technical and organizational measures in order to guarantee a level of data protection and data security corresponding to the degree of risk. The specific tasks and responsibilities incumbent on the data processor are contained in the contract between IDBC and the data processor.

Service providers qualifying as data processors act as contributors in the following activities:

### 6.1. Invoicing

IDBC issues and manages invoices for its service fees by utilizing the services of KBOSS.hu Kft. (szamlazz.hu), [Headquarters: 1031 Budapest, Záhony utca 7/D, company registration number: 01 09 303201, tax number: 13421739-2-41, privacy policy: <https://www.szamlazz.hu/adatvedelem/>].

### 6.2. Electronic Data Processing

IDBC processes personal data related to its business operation electronically, for which it utilizes modules of the Zoho One software suite developed and operated by Zoho Corporation Pt. Ltd. (Headquarters: Estancia IT Park, Plot No. 140 & 151, GST Road, Kanchipuram Dist, Vallancherry Village Chennai, Tamil Nadu 603202, India). Further details on Zoho's data protection and data security principles can be read here: [Zoho - Data Privacy and our stand against surveillance](#), and regarding GDPR compliance here: <https://www.zoho.com/gdpr.html>.

## 7. Data Security

IDBC ensures through IT, organizational, and personnel measures that the personal data it processes is protected against, among other things, unauthorized access, unauthorized alteration, or destruction.

Access to personal data stored in the IT system is role-based and logged, meaning it can always be verified who accessed what personal data and when. Authorized, trained employees of IDBC can access the processed personal data exclusively to perform their job tasks and to the extent necessary for that purpose.

## 8. Rights of the Data Subject Regarding Data Processing

### 8.1. Right of access by the data subject

The data subject may request information in writing from IDBC through the contact details provided in Section 1 about what personal data of theirs is being processed, on what legal basis, for what data processing purpose, from what source, for how long, and to whom, when, based on

what legislation the Data Controller granted access to which of the data subject's personal data, or to whom it transferred them.

IDBC fulfills the data subject's request within a maximum of one month in a response letter sent to the contact address provided by the data subject.

If the data subject requests the information under this section in multiple copies, the Data Controller is entitled to charge a reasonable fee proportionate to the administrative costs of producing the additional copies.

If the data subject's right of access under this section adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse the fulfillment of the data subject's request to the necessary and proportionate extent.

Prior to fulfilling the request, IDBC may ask the data subject to clarify the content of the request and exactly specify the requested information and data processing activities.

### 8.2. [Right to Rectification](#)

The data subject may request in writing, through the contact details provided in Section 1, that IDBC modify any of their personal data (for example, they can change their e-mail address or other contact details at any time) or supplement incomplete personal data.

The Data Controller fulfills the request within a maximum of one month, and notifies the data subject of this in a letter sent to the contact address they provided.

IDBC informs those to whom it transferred the data subject's personal data about the rectified data, provided that the information is not impossible or does not require a disproportionate effort from the Data Controller.

### 8.3. [Right to Erasure](#)

The data subject may request in writing from IDBC, through the contact details provided in Section 1, the erasure of all or some of their personal data. IDBC will not fulfill the erasure if legislation obliges the further storage of personal data, and the data processing deadline specified by legislation has not yet expired.

If there is no such obligation, IDBC processes the data subject's request within a maximum of one month and notifies the data subject of the result in a letter sent to the contact address they provided.

IDBC informs those to whom it previously transferred the data subject's personal data about the erasure of the data, provided that informing them is not impossible or does not require a disproportionate effort from the Data Controller.

### 8.4. [Right to Blocking \(Restriction of Data Processing\)](#)

The data subject may request in writing, through the contact details provided in Section 1, that IDBC block their personal data. Blocking is done by clearly indicating the restricted nature of the data processing and storing it separately from other data. This means that, with the exception of storage, no other data processing operation may be performed on the data. The blocking lasts as long as the reason indicated by the data subject necessitates the blocked storage of the personal data.

The data subject may request the blocking of personal data, for example, if they believe that IDBC has processed their personal data unlawfully, but it is necessary for the official or court procedure initiated by them that the Data Controller does not erase the personal data. In this case, IDBC processes the personal data in a blocked manner until requested by the authority or court, and erases or continues to process them after the conclusion of the official procedure.

### 8.5. Right to Object

The data subject may object in writing to the data processing through the contact details provided in Section 1 if it is necessary for data processing based on IDBC's legitimate interests, except where IDBC demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.

IDBC investigates the data subject's objection within a maximum of one month, and notifies the data subject of the result (including the communication regarding the erasure of any unlawfully processed personal data) in a letter sent to the contact address they provided.

## 9. Enforcement and Remedy Options Related to Data Processing

In order to enforce their rights related to the processing and protection of their personal data, the data subject may contact IDBC through the contact details of the data controllers specified above. If the data subject believes that their rights to the protection of their personal data have been violated, they can seek a legal remedy from the following authority:

National Authority for Data Protection and Freedom of Information (NAIH)

Headquarters: 1055 Budapest, Falk Miksa u. 9–11.

Postal address: 1363 Budapest, Pf. 9.

Phone: +36 (1) 391-1400

Website: [About the Authority](#)

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

If the data subject experiences the unlawfulness of the processing of their personal data, they can initiate a court procedure (civil lawsuit) against the Data Controller. The adjudication of the lawsuit falls under the jurisdiction of the regional court (törvényszék). At the choice of the data subject, the lawsuit can also be initiated before the regional court corresponding to the data subject's place of residence (you can view the contact details of the regional courts via the following link: <https://birosag.hu/torvenyszekek>).

## 10. Updating and Availability of the Privacy Policy

IDBC reserves the right to unilaterally modify this Privacy Policy.

The Privacy Policy may be modified, in particular, if necessary due to changes in legislation, the practice of the data protection supervisory authority, business needs, or newly discovered security risks.