

Data privacy policy of Eisberg Hungary Kft.

The **data controller** as defined by the Federal Act on Data Protection (SR 235.1 – "FADP") and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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 (General Data Protection Regulation, "GDPR"), is:

Eisberg Hungary Kft., with its registered office at Kisfaludy u. 63, 2360 Gyál, Hungary

Email: hungary@eisberg.com

[Online contact form and other contact information](#)

You can reach the contact person for data protection at

datenschutz.CH@bellfoodgroup.com

The representative of the controller in the European Union pursuant to Art. 27 GDPR is:

We expressly point out that the contents of a message sent to the e-mail address are not just read by our data protection officer. If you wish to transmit confidential information, we would ask you to first contact us directly via this e-mail address.

Where reference is made hereinafter to articles of the FADP or GDPR, the determining factor is whether the data processing falls within the scope of the FADP and/or the GDPR. These standards only apply to the extent that the material and geographic scope of the regulation in question is affected.

1. Extent and purpose of the processing of personal data

We process the personal data of visitors to our website in compliance with the data protection provisions that apply to the relevant process and generally only in order to provide a functional website and to define, control and implement our contents, strategies, offers and services.

The temporary storage of the IP address by the system is necessary to enable the website to be delivered to the user's computer. For this, the IP address must remain stored for the duration of the session.

The data is stored in log files to ensure the functionality of the website. In addition, the data helps us to optimise the website and to ensure the security of our information technology systems. No evaluation of the data for marketing purposes takes place in this context.

2. Description and scope of data processing

Every time our website is accessed and data is transmitted via contact forms, our system automatically collects data and information from your computer system. The following data is collected:

Information about the type of browser (and its version), the operating system, the Internet service provider, the IP address, date and time of access, Internet pages from which the data subject's

system accesses our website, Internet pages accessed by the user's system via our website and click streams.

The data is also stored in the log files on our system. This data is not stored together with other personal data.

3. Lawful basis for the processing of personal data

The lawful basis for the temporary storage of personal data and log files is Art. 31 para. 1 FADP and Art. 6 para. 1 (f) GDPR as the storage is necessary to **protect an overriding interest of our company or a third party**. Our overriding interest is justified by the fact that we cannot publish the website if the necessary technical settings are not available or cannot be stored or processed. Processing is also necessary to identify, fight and document attacks on the integrity and functionality of the website. This overrides the interests of the website users as it is the user's personal decision to visit the website and users can terminate the processing of their data at any time by leaving the site.

4. Duration of storage

The personal data is deleted as soon as it is no longer necessary for achieving the purpose for which it was collected. Data collected for the provision of the website is erased when the respective session has ended.

Data stored in log files is erased seven months after the log file is generated at the latest. Further storage is possible. In this case, the IP addresses of the users are erased or masked so that it is no longer possible to identify the user.

5. Communication to third parties

We do not communicate personal data that we collect in the context of our website to third parties, with the following exceptions:

- Companies of the Bell Food Group, i.e. the group of companies to which we belong;
- Service providers who help us to maintain, service, use, analyse and update our website;
- Government institutions and courts that are authorised to bindingly instruct us to deliver data.

In this regard, we wish to point out that the website provides generic contact data (e.g. hungary@eisberg.com, contact forms and central phone numbers) and that third parties help us to process such requests. E-mails sent to the generic e-mail addresses and contact forms are inspected by third parties for malware, phishing, spam and other attacks, including to protect our IT systems, pre-sorted by topic and contact partner, and then sent to the corresponding employees of our company.

We use **SSL/TLS encryption** to provide the best possible protection against access by third parties for the data sent to us. An encrypted connection is identified by the browser address "https://" and a lock symbol. When SSL/TLS encryption is activated, the data you send to us cannot be read by third parties.

6. Place of data processing

The data is processed in the European Economic Area and in Switzerland. The EU Commission has issued an adequacy decision as defined by Art. 45 GDPR (2000/518/EC) for Switzerland.

Data that is processed by third parties, e.g. in accordance with section 12 or in the context of the provision, use and maintenance of the software and hardware used by us and the IT landscape of our company, is sometimes also partially processed in third-party countries. In compliance with Art. 16 f) FADP and Art. 44 et seq. GDPR, we have entered into the necessary agreements and implemented the measures required to ensure the lawfulness of data transmission with such companies.

7. Use of cookies

Our website uses cookies. Cookies are text files that are stored in the internet browser or by the internet browser on the computer system of visitors to our website. If the website is called up, a cookie may be stored on the user's operating system. The purpose of using cookies is to simplify the use of the website. Some functions of our website cannot be offered without the use of cookies. To do this, it is necessary for the browser be recognised even after a page change.

We need the following cookies for the following applications:

Acceptance of cookie confirmation
The following data is stored and transmitted in the cookies:

Cookies accepted
The user data collected by technically necessary cookies is not used to create user profiles.

In addition to the technically necessary cookies, we also use cookies that are not technically necessary but enable an analysis of the surfing behaviour of visitors to our website. The following personal data is processed in this way:

Entered search terms, frequency of page views, use of website functions, anonymised IP

"Analysis cookies" are used to improve the quality of our website and its content. Through analysis cookies, we learn how the website is used and can thus continuously optimise our offer.

When visiting our website for the first time, visitors to the website are actively informed about the use of analysis cookies and are asked to consent to the processing of the personal data collected in this regard. In this context, reference is also made to this data privacy policy. The cookie management tool is not actively displayed during repeat visits. However, visitors to the website can at any time change their settings by using the tool available at the following link:

[Cookie settings](#)

Alternatively, you can also generally block all cookies by changing your browser settings.

Example for the Edge Browser (Microsoft):
SETTINGS – COOKIES AND SITE PERMISSIONS – MANAGE AND DELETE COOKIES AND SITE DATA

If cookies are deactivated for our website, not all functions of the website may be fully usable.

8. Newsletter / mailing list

You can subscribe to a free newsletter or mailing list (hereinafter only referred to as **newsletter**) on our website. The option to receive a newsletter is also available when placing an order and establishing contact on our website. The newsletter can be unsubscribed to at any time. Each newsletter contains a link for this purpose.

When subscribing to the newsletter, the following data can be requested by the input screen and sent to us, if the required fields are available:

Query category, salutation, first name, surname, company name, street, postcode, town, country, telephone, fax, e-mail, language, date and time of registration, consent to the data privacy policy

ONLY THE E-MAIL ADDRESS AND CONSENT TO THE DATA PRIVACY POLICY ARE COMPULSORY FIELDS.

If the user has given their consent, the lawful basis for the processing of data following a newsletter subscription by the user is Art. 31 para. 1 FADP and Art. 6 para. 1 (a) GDPR in the area of application of the GDPR (consent of the data subject).

Personal data processed for the purpose of sending out newsletters is not forwarded to third parties, except within the Bell Food Group, i.e. the group of companies to which we belong, and third parties who provide technical support for the despatch of the newsletters. The data is forwarded for storage in central data centres of the Bell Food Group and for the preparation of analyses and strategies for the business activities of the Bell Food Group.

Data is collected for the purpose of providing interested persons with information about our companies and to define strategies, topics and other objectives relating to communication.

The personal data collected in this context is erased when the data subject cancels the newsletter subscription.

9. Contact forms

Contact forms are available on our website. If a visitor to the website takes advantage of this possibility, the data entered in the input mask is transmitted to us and stored. This data includes:

Division, salutation, first name, surname, e-mail, message, date and time of registration, consent to the data privacy policy.

ONLY THE DATA MARKED IN RED ABOVE IS COMPULSORY.

The completed contact form will be sent to the e-mail address hungary@eisberg.com.

Alternatively, you can contact us via the e-mail address provided or by telephone. In this case, the user's personal data transmitted by e-mail or telephone, in particular the e-mail address or telephone number, is stored. Please note that third parties are involved in this process – see section 5 of this data privacy policy.

The lawful basis for the processing of data is Art. 31 para. 1 FADP and Art. 6 para. 1 (a) GDPR in the area of application of the GDPR (consent of the data subject).

The personal data from the input screen is only used for processing the establishment of contact.

The personal data is erased as soon as it is no longer necessary for achieving the purpose for which it was collected.

Users can at any time revoke their consent to the processing of their personal data by sending an e-mail to hungary@eisberg.com. In such a case, the conversation cannot be continued. If action has already been taken based on the communication that has already taken place and has legally binding consequences for us or the data subject, we are entitled to refuse the request for erasure.

10. Career management

Job applications can be submitted online on our website. The online application platform is operated on our behalf by a third party, P&I Personal & Informatik AG, Kreuzberger Ring 56, 65205 Wiesbaden, Germany, as order processor; you can find its data privacy policy here: <https://www.pi-ag.com/datenschutz/>.

As part of the online application, the following personal data is usually collected (depending on the position):

salutation, first name, surname, telephone, e-mail, LinkedIn or Xing profile, CV.

ONLY THE DATA MARKED IN RED ABOVE ARE MANDATORY FIELDS.

The completed application form will be sent to the e-mail address ehu.hr@eisberg.com.

The lawful basis for the processing of data is Art. 31 para. 1 FADP and Art. 6 para. 1 (a) GDPR in the area of application of the GDPR (consent of the data subject).

The personal data from the input screen is only used for processing the application.

The data is (i) erased within the periods defined for employment relationships after the end of employment, provided that the data subject enters into an employment relationship with the Bell Food Group, or (ii) six months after the date on which the data subject is informed that they will not be employed.

11. Rights of the data subject

You have the following rights vis-à-vis us as the controller, to the extent and under the conditions set out in the applicable data protection legislation:

Right to information

You can ask us to confirm whether personal data concerning you is processed by us. If such processing is performed, you can request the information prescribed by law from us (Art. 25 FADP and Art. 15 GDPR).

Right to rectification

You have a right of rectification and/or completion vis-à-vis us if the processed personal data

concerning you is incorrect or incomplete. We must do the rectification as soon as you have informed us of the corrections to be made (Art. 32 FADP and Art. 16 GDPR).

Right to restriction of processing

You can request that the processing of personal data concerning you be restricted (Art. 32 FADP and Art. 18 GDPR).

Right to erasure

You can ask us to erase the personal data concerning you (Art. 32 FADP and Art. 17 GDPR).

If we have made the personal data concerning you public and we are obliged under applicable data protection provisions to erase this data, we will take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to inform those responsible for data processing who process the personal data that you as the data subject have requested the erasure of all links to this personal data or copies or replications of this personal data.

Right to data portability

You have the right to receive the personal data that you have disclosed to us. You also have the right to ask us to transmit this data to another controller (Art. 28 FADP and Art. 20 GDPR).

Right of objection

You have the right to object to the future processing of your personal data at any time (Art. 30 FADP and Art. 21 GDPR).

We will no longer process personal data relating to you unless we can prove compelling grounds for processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Right to revoke the consent

You have the right to revoke your consent to the processing of your personal data at any time (Art. 27 Swiss Civil Code and Art. 7 para. GDPR). The revocation of consent does not affect the legality of the processing carried out on the basis of this consent before revocation.

Automated decision in individual cases including profiling

You have the right not to be subject to a decision based exclusively on automated processing – including profiling – that has legal effect against you or significantly impairs you in a similar manner (Art. 22 GDPR).

Right of appeal to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to appeal to a supervisory authority.

Nemzeti Adatvédelmi és Információszabadság Hatóság

Falk Miksa utca 9-11

1055 Budapest

ugyfelszolgalat@naih.hu

<https://naih.hu/>

12. Data processing by third parties

We use plugins of the following third-party providers:

Name of service	Provider	Data policy of the provider
Friedly Captcha	Friendly Captcha GmbH, Am Anger 3-5, 82237 Woerthsee, Germany	https://friendlycaptcha.com/privacy/

When you call up our website, your browser establishes a direct connection to the servers of the third-party provider. The content of the third-party plugin is transmitted directly to your browser and embedded in the site. This connection informs the third-party provider that your browser has called up the website in question, even if you do not have an account or profile with this third-party provider. Your browser sends this information (including your IP address) directly to a server of the third-party provider, where it is stored.

Please consult the data privacy policy of the relevant third-party provider at the above link for more information on the purpose and scope of data collection and the further processing and use of the data by this third-party provider as well as the settings available to you to protect your privacy.

Google Analytics

This website uses the "Google Analytics" service that is provided by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) for analysis of website usage by visitors to the website. The website uses "cookies" – text files that are stored on your terminal. The information collected by the cookies is usually sent to a Google server in the USA and stored there.

IP anonymisation is used on this website. The IP addresses of users within the member states of the EU and the European Economic Area are abbreviated. This abbreviation eliminates the personal reference to your IP address. As part of the contract data agreement concluded between us and Google Inc., Google uses the information collected to evaluate the use of the website and to provide services related to internet use.

You can prevent the storage of cookies on your device – see section 7.

You can also use a browser plugin to prevent the information collected by cookies from being sent to Google Inc. and used by Google Inc. The following link leads you to the corresponding plugin:

<https://tools.google.com/dlpage/gaoptout?hl=en>

You will find further information on data use by Google Inc. here: <https://support.google.com/analytics/answer/6004245?hl=en>