

Privacy Notice

on the processing of personal data of individuals entering the premises of Nitrogénművek Zrt.

Based on Articles 13 and 14 of the 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 on repealing Directive 95/46/EC (hereinafter: GDPR) the Controllers share the following privacy notice with the data subjects regarding the processing of personal data.

1. Description of the Controllers

1.1. Primary controller

Nitrogénművek Vegyipari Zártkörűen Működő Részvénytársaság

Abbreviated name: Nitrogénművek Zrt.

Registered office: H-8105 Pétfürdő, Hősök tere 14.

Mailing address: H-8105 Pétfürdő, Hősök tere 14.

Email address: art@nitrogen.hu

Phone number: +36 (88) 620-100

Fax: +36 (88) 620-102

Website: www.nitrogen.hu

1.2. Additional controllers

BIGE SCUTUM Szolgáltató Korlátolt Felelősségű Társaság Abbreviated name: BIGE SCUTUM Kft.

Registered office: H-4400 Nyíregyháza, Kórház utca 1/A

Mailing address: H-4400 Nyíregyháza, Kórház utca 1/A

Email address: bigescutum@gmail.com

Phone number: +3630/301-3792

2. Description of the Processors

There are no additional data processors taking part in the data processing.

3. Data processing principles

The Controllers only process personal data which are essential to the realisation of the data processing purpose and which are suitable for the achievement of the purpose. Personal data are processed only to the extent and for the period necessary for the realisation of the purpose and they protect the data subjects' personal data as it may be expected from them.

4. Security of the data processing

The Controllers carry out appropriate technical and organisational measures considering the costs of implementation and the nature, scope, circumstances and purposes of the data processing and the risk of varying probability and severity to the rights and freedoms of natural persons to guarantee the data security on a level corresponding to the extent of the risk.

The requirements related to the technical and organisational measures adequate to the risks are regulated in the "41/2015 (VII. 15.) BM decree on technological security requirements, requirements on secure information devices and products, and requirements on security classification and security rating defined in Act L of 2013 on the electronic information security of state and local government organisations" the requirements of which Nitrogénművek Zrt. meets.

5. Related legislation

- Regulation (EU) 2016/679 of the "European Parliament and of the Council" on the protection of natural persons with regard to the processing of personal data and on the free movement of such data;
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information;
- Act CXXXIII of 2005 on the Rules of Personal and Property Protection Activities and Private Investigation.

6. The processed personal data and the purpose of data processing

#	Personal data	The purpose of data processing
1.	Surname, First name, Place and date of birth, Mother's name, License plate number	Registration of individuals entering the premises of Nitrogénművek for the provision of property protection.
2.	Recordings of the security camera	Recording of the individuals entering the premises of Nitrogénművek and the events occurring at the premises for the provision of property protection.

7. The duration and legal ground of data processing

#	The duration of data processing	The legal ground of data processing	Note
1.	1 year	the legitimate interest of the controller(s) (Article 6 f) of the GDPR)	based on Act CXXXIII of 2005 and the balance of interests assessment
2.	3 days	the legitimate interest of the controller(s) (Article 6 f) of the GDPR)	based on Act CXXXIII of 2005 and the balance of interests assessment

8. Recipients and their categories, if applicable

Nitrogénművek Zrt. does not make available data recorded by the access control system and the camera surveillance system operated at the reception or elsewhere to the contractors carrying out work at the premises of Nitrogénművek

Zrt. An exception to this is the data provision to business organisations having a site at the Pétfürdő industrial area of Nitrogénművek Zrt. which is performed by the controller upon written request where appropriate.

Data from the access control system and the camera surveillance system operated at the reception or elsewhere may be provided to the investigation authority, to the authority proceeding due to violation of the rules and to the body conducting preparatory procedure due to violation of the rules. Data provision based on the request of these authorities and bodies may be performed upon the authorisation of the CEO of Nitrogénművek Zrt.

9. Rights of the data subject

9.1. Right of access

The data subject may have the right to obtain from the controller the copy of the personal data undergoing processing.

9.2. Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

9.3. Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.

In this case, the controller shall no longer process the personal data unless the controller demonstrates legitimate grounds for the processing which override the interests, rights and freedoms of the data subject.

9.4. Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing.

If the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

9.5. Right to erasure (right to be forgotten)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay upon his/her request or in the case of withdrawal of his/her consent on which the processing is based, if there is no other legal ground for the processing or if the personal data have been processed unlawfully.

10. Possibilities of legal remedy

10.1. Right to lodge a complaint with the controller

The data subject may lodge a complaint or any question, request to the controller regarding the processing of personal data concerning him/her. The contact details of the responsible staff member of Nitrogénművek Zrt.:

Name: Dr. Miklós Papp

Address: H-8105 Pétfürdő, Hősök tere 14.

Email address: gdprcsoport@nitrogen.hu

Phone number: +36 30 137-8995

10.2. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with the supervisory authority, if the data subject considers that the processing of personal data relating to him or her infringes the related legislation. The contact details of the supervisory authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Abbreviated name: NAIH

Registered office: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c

Mailing address: H-1530 Budapest, Pf.: 5.

Email address: ugyfelszolgalat@naih.hu

Phone number: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Website: <http://naih.hu>

10.3. The possibility to institute legal proceedings at the court of the place of domicile or residence

He/she may institute proceedings before the court against the controller or – regarding the data processing activities belonging to the scope of activity of the processor – the processor if according to him/her the controller or the processor commissioned by it or proceeding according to its order processes the personal data with the violation of the regulations determined in the legislation or in the obligatory legal act of the European Union concerning the processing of the personal data.

11. Annexes

11.1. Annex 1: The balance of interests assessment

Prior to the data processing based on the legitimate interest Nitrogénművek Zrt. carries out a 3-step balance of interests assessment during which:

- it identifies the legitimate interest of the Controller regarding the processing of the personal data constituting the subject of the balance of interests assessment;
- it establishes the interests and basic rights of the Data Subject regarding the personal data constituting the basis of the balance of interests assessment;
- it carries out the weighing up of the legitimate interests of the Controller and the legitimate interests and basic rights of the Data Subject and based on this it establishes if the personal data might be processed or not.

1. The interests and legal grounds of the controller:

Based on "Act CXXXIII of 2005 on the Rules of Personal and Property Protection Activities and Private Investigation" the Controller may apply an electronic access control system and/or an electronic surveillance system for property protection if it provides the application of the data protection rights according to the Act on the Right of Informational Self-Determination and on Freedom of Information during the processing of the personal data used for their operation, and places information about the person of the controller and the method of data processing.

According to "Government Decree No. 65/2013. (III. 8.) of the implementing Act CLXVI of 2012 on the identification, designation and protection of critical systems and facilities" Nitrogénművek Zrt. constitutes a critical system and facility where property protection and the provision of physical security is of top priority which could be implemented only to a limited extent without the use of the mentioned electronic means.

2. The interests and basic rights of the data subject:

According to the right of informational self-determination of the Data Subject as a natural person, only he/she is in control of his/her data. His/her basic interest is the implementation of the provisions protecting the personal data and the privacy set out in "Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data" and "Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information".

3. The result of the balance of interests assessment

The provision of property protection on a high level is the unambiguous legitimate interest and statutory obligation of the Controller, which could not be provided otherwise and during which it only processes personal data to the extent necessary for the achievement of the purpose. All these override the interests of the Data Subject, therefore the Controller reserves the right to process the personal data of the Data Subject according to those set out in the Privacy Notice.

The Data Subject may object to the result of the balance of interests assessment and the data processing by ways detailed in the Privacy Notice.

11.2. Annex 2: The placement of cameras