

CLINICAL RESEARCH COORDINATION KFT. - PRIVACY POLICY

/for managing contractual partner data from before May 25, 2018 /

This Privacy Policy ("**Policy**") is used by CLINICAL RESEARCH KOORDINATION KFT. (The "Company / Data Controller") shall inform the data subjects of personal data processed in connection with their contractual relations in accordance with Regulation (EU) 2016/679 of the European Parliament and of the European Council ("GDPR" or "Regulation"), in particular Articles 13 and 14.

The principle of fair and transparent data management requires that the data subject is informed of the facts and purposes of data processing. Information related to the processing of personal data concerning the data subject shall be provided to the data subject at the time of collection or, if the data are collected from sources other than the data subject, within a reasonable period, with the circumstances taken into account. If personal data may lawfully be shared with another recipient, the data subject shall be informed at the time of the first instance of sharing. If the data controller is unable to provide the data subject with information on the origin of the personal data due to receiving them from different sources, general information shall be provided.

1. The Company as data controller and its contact details

The data of the Company as data controller can be found in the legal documents (e.g. offer, contract), and the current data of the Company are available at www.e-cegjegyzek.hu , a free and authentic database upon input of the name or other identifying data of the Company (company registration number, tax number).

If you would like further information about the Company's data management or if you wish to exercise the rights contained in this Policy, you may do so by way of the contact information below:

- postal address: CLINICAL RESEARCH COORDINATION KFT. 1121 Budapest, Tálya u. 23.
- e-mail address: info@coordination.hu
- webpage: www.coordination.hu

2. Management of the Data Subject's data

2.1. / Data Subjects

The Company may manage the personal data of the following natural persons [**"Data Subject(s)"**] when managing data related to its contractual partners:

- contracting party (individuals, self-employed persons);
- legal representative, employee, contact person, agent, other performance assistant (e.g. subcontractor, employee, temporary employee) of the contracting party (in case of company, organization) (partner);
- in the case of a partner using the service, an employee who is personally responsible for the subject matter of the service and other entitled persons (e.g. user of a rented car);

Detailed information on each type of Data Subject is included in the annex to the Policy. 2.2./

Access to personal data, types of processed personal data

Processed personal data

- are shared with the Company by the Data Subject himself or
- a partner

by means of a document (contract, statement of consent, etc.) forming the basis of the legal relationship or issued during the creation of the legal relationship.

In accordance with the purposes and legal basis set forth in the annex, the Company may also collect personal data through the consultation of authentic and public databases operated by the courts, the National Tax and Customs Administration (NAV) or other public organizations.

The types of personal data processed in relation to the Data Subjects are detailed in the annex to this Policy. 2.3./ Individual purposes and legal bases for data management

2.3.1 Performance of contract

The processing of personal data is necessary in order to fulfill the contractual obligations of the Data Controller.

The duration of data management is the same as the duration of the contract.

Considering that without the provision of the above-mentioned personal data (data supply) the Company or the Partner will not be able to fulfill its obligations under this contract, the Partner or the Data Subject shall personally provide the Company with personal data. Failure to provide the information may result in the performance of the Contract being rendered impossible, and the Company may become entitled to withdraw from the contract.

If the legal basis for the specific data management is the performance of the Contract, the Company shall manage the Data Subject's data even after the termination of the Contract, in order to present, enforce and protect the legal claims arising from the Contract.

The Company shall retain the personal data of the Data Subject for five years following the failure or termination of the contract, in accordance with the general statute of limitations set out in Act V of 2013 of the Civil Code. In the case of certain specialized contracts, this period may be longer than 5 years by contract or by law.

On the legal basis detailed in this section, the Company also managed and partially still manages personal data related to the contracts concluded before the date of the Regulation's application (25 May, 2018). However, according to the Regulation, the obligation to provide information on the fact of data processing is not required if the provision of information to the Data Subject proves impossible or would require a disproportionate effort on the part of the Company. In view of this, the Company informs the Data Subjects - due to their high numbers - of the data management relying on a legal basis created prior to the date of application by publishing this Policy on its website, not by way of individual notification.

2.3.2 Fulfillment of legal obligations

The Data Controller may also manage the Data Subject's personal data for the purpose of complying with legal obligations. The specific legal obligations are described in the annex to the Policy.

Given that the management of data under this section is a legal obligation of the Company, the disclosure of personal data is mandatory, failure to provide the information may result in the performance of the Contract being rendered impossible, and the Company may become entitled to withdraw from the contract or to refuse the performance of Contract.

2.3.3 The legitimate interest of the Company and/or a third party

The Company may also manage the Data Subject's personal data based on legitimate interests. If the data management is based on this legal basis, the Company shall take into account the requirements for the necessary and proportionate level of data management.

Given that the management of data under this section is in the legitimate interest of the Company or a third party, the disclosure of personal data is mandatory and failure to provide data may result in the Company's refusal to enter into or perform the Contract.

2.3.4 The Data Subject's voluntary contribution

The processing of personal data is based on the consent of the Data subject (voluntary, concrete, well-informed and explicit expression of will). The Data Subject may give his consent

- (i) separately from any other statement in the contract regarding the provision of the service, or
- (ii) in a separate statement.

The consent is voluntary and the Data Subject is entitled to withdraw his consent at any time, without limitations by notifying the Company. The notification may be sent to any of the contact addresses listed in Section 1 of the Policy. The Data Subject's notification shall indicate in an identifiable manner which type of data processing he intends to withdraw his consent from.

The withdrawal of consent shall have no consequences for the Data Subject. However, the withdrawal of consent shall not affect the lawfulness of the processing of data prior to the withdrawal carried out on the basis of the consent.

3. Recipients of personal data

The Data Controller may transfer the personal data of the Data Subject to the following persons or organizations:

- to organizations responsible for labor safety, quality assurance and certification entrusted by the Company, all of which shall be considered as joint data controllers regarding the personal data provided. If the organization providing work safety and quality assurance outsources this task to a third party, the third party shall be considered a data processor.
- to the organization(s) providing back-office services to the Company (Finance and Accounting, HR, IT, Law), all of which shall be considered data processors regarding the transferred data.
- to a partner
- to the authority specified by the statute on the basis of statutory provisions

The Company does not transfer personal data to third countries. If the need for data transfer to a third country arises, it should only occur with the explicit and voluntary consent of the Data Subject.

4. The Data Subject's rights

4.1 ./ Right of access

The Data subject has the right to receive feedback from the Data Controller as to whether the processing of his personal data is ongoing and, if such processing is in progress, to receive access to the personal data and the following information:

- (i) the purposes of the processing of the personal data in question,
- (ii) the categories of personal data in question,
- (iii) the categories of recipients to whom the Data Subject's personal data have been or will be disclosed, including in particular third country recipients and international organizations (in the case of transfers to third country recipients or international organizations, the Data Subject is entitled to request information as to whether the transfer is subject to appropriate safeguard measures),
- (iv) the intended period for which the personal data in question will be stored or, if this is not possible, the criteria for determining this period,

- (v) the rights of the Data Subject (right of rectification, erasure or limitation, right to data portability and right of objection against the processing of personal data),
- (vi) the right to lodge a complaint with a supervisory authority,
- (vii) if the data were not obtained from the Data Subject, then all available information about the source,
- (viii) the fact of making an automated decision on the personal data in question, including profiling; if such data processing is carried out, the information shall include the reasoning behind the processing, as well as its significance and likely consequences for the Data Subject.

If the Data Subject has submitted his request electronically, the requested information shall be provided in a widely used electronic format, unless otherwise requested by the Data Subject.

Prior to fulfilling the Data subject's request, the Company may ask the Data Subject to specify the request's content, along with the requested information and data management activities.

If the Data Subject's right of access under this section adversely affects the rights and freedoms of others, in particular the business secrets or intellectual property of others, the Company shall be entitled to deny the Data Subject's request to the necessary extent.

If the Company does not process the personal data indicated by the Data Subject, it shall inform the Data Subject of this in writing.

4.2 ./ Right to rectification

The Data Subject has the right to request the rectification of personal data concerning him or her. If the personal data concerning the Data Subject are incomplete, the Data Subject has the right to request the supplementation of the personal data.

In exercising the right to rectification/supplementation, the Data Subject shall indicate which data are inaccurate or incomplete and shall also inform the Company of the exact and complete data. The Company shall have the right, in justified cases, to call upon the Data Subject to provide proof of the specified data, preferably in the form of official documents.

The Company shall, within a reasonable time after fulfilling the Data Subject's request for the rectification of the data, inform the persons with whom they have shared the Data Subject's personal data, provided that this is not impossible or does not require a disproportionate effort from the Company. At the request of the Data Subject, the Company shall inform provide information of the addressees.

4.3. / Right to erasure ("right to be forgotten")

The Data Subject shall have the right to request that the Company delete any personal data related to him or her without undue delay in any of the following cases:

- (i) personal data provided by the Data Subject are not required for the purpose for which they were collected or otherwise processed by the Company,

- (ii) the Company has processed the personal data (including special data) on the basis of the Data Subject's consent, the Data Subject has withdrawn his consent in writing and there is no other legal basis for data processing,
- (iii) the Data Subject objects to data processing based on the legitimate interest of the Company and there is no compelling legitimate reason for the Company to take precedence over the interests, rights and freedoms of the Data Subject or other reasons related to the filing, enforcement or defense of legal claims,
- (iv) unlawful processing of personal data by the Company,
- (v) the Data Subject objects to data management and there is no overriding reason for data management.

The Data Subject shall submit his request for deletion in writing and indicate the reason for which they wish to have the personal data deleted.

If the Company accepts the Data Subject's motion for deletion, it shall delete the processed personal data from all of its records and shall inform the Data Subject accordingly.

The Company shall, within a reasonable time after fulfilling the Data Subject's request for the deletion of the data, inform the persons with whom they have shared the Data Subject's personal data, provided that this is not impossible or does not require a disproportionate effort from the Company. At the request of the Data Subject, the Company shall inform provide information of the addressees.

The Company shall not be obliged to delete personal data if its processing is necessary:

- (i) the exercise of the right to freedom of expression and information,
- (ii) to comply with any obligation of the Company to process personal data under Hungarian or European Union law,
- (iii) for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company,
- (iv) the pursuit of a general interest in the field of public health,
- (v) archiving in the public interest, for scientific and historical research purposes or for statistical purposes, provided that the exercise of the Data Subject's right to be forgotten would be likely to render impossible or seriously compromise the processing of data,
- a) for the filing, enforcement or defense of legal claims.

4.4. Right to restrict data management

The Data Subject shall have the right to request that the Company restrict the management and use of his or her personal data in any of the following cases:

- (i) the Data Subject disputes the accuracy of the personal data (in which case the restriction shall continue to be in effect until the Company verifies the accuracy of the data),
- (ii) unlawful processing of personal data by the Company, but the Data Subject asks for restriction instead of deletion,

- (iii) the purpose of the Company's data management has ceased to exist, but the Data Subject requires it for submitting, enforcing or defending legal claims,
- (iv) the Data Subject objects to the data processing based on the legitimate interest of the Company and there is no compelling legitimate reason for the Company to take precedence over the data subject's interests, rights and freedoms or to submit, assert or defend legal claims; in this case, the restriction shall continue to apply until it is determined whether the legitimate reasons of the Company have priority over the legitimate reasons of the Data Subject.

In the event of restriction - with the exception of data storage -, personal data may only be processed with the consent of the Data Subject or for the purpose of submitting, enforcing or defending legal claims, or for protecting the rights of other natural or legal persons, or for important public interest purposes of a member state of the European Union.

The Company shall, within a reasonable time after fulfilling the Data Subject's request for restriction, inform the persons with whom they have shared the Data Subject's personal data, provided that this is not impossible or does not require a disproportionate effort from the Company. At the request of the Data Subject, the Company shall inform provide information of the addressees.

4.5 Right to protest

If the processing of the Data Subject's data is based on legitimate interest, an important guarantee provision sets out that Data Subject shall be provided with appropriate information and the right to object in relation to the data processing. This right must be expressly brought to the Data Subject's attention during the first contact occasion at the latest.

On this basis, the Data Subject shall have the right to object to the processing of his or her personal data, and in this case the Company may not further process the Data Subject's data, unless it can be proved that

- (i) the Company's processing of the data is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the Data Subject, or
- (ii) the data management is related to the filing, validation or defense of the Company's legal claims.

4.6 Right to data portability

The Company informs the Data Subject that he or she may not exercise his or her right to data portability under Article 20 of the GDPR, as the Data Controller does not process personal data in an automated manner.

4.7 Right to legal remedy

4.7.1 Right to complain

If the Data Subject considers the Company's processing of personal data to be a violation of the applicable data protection laws, in particular the GDPR, he or she has the right to lodge a complaint with the National Data Protection and Freedom of Information Authority.

Contact details of the National Privacy and Freedom of Information Authority:

Webpage: <http://naih.hu/>

The Data Subject has the right to lodge a complaint with another supervisory authority, in particular in the member state in which he or she is habitually resident, employed or in which the alleged infringement occurred.

4.7.2 Right to apply to the courts (right of action)

Regardless of the right to complain, the Data Subject may take legal action if his or her personal data have been violated under the GDPR.

The Company, as a data controller with a domestic place of business, may be sued in a Hungarian court.

According to the current Infotv. 22. § Section (1), the Affected Person may also file a lawsuit in the court of his or her place of residence. The contact details of the Hungarian courts can be found at: <http://birosag.hu/torvenyszekek>.

5. Data security

The Company undertakes to ensure the security of personal data and to take all technical measures to ensure that the processed personal data are protected from unauthorized disclosure, destruction, alteration or use. It further undertakes to inform any third party to whom any personal data may be transferred or transmitted, in order to comply with its obligations in this regard.

6. Further provisions

In the event that the Company has a reasonable doubt as to **Error! Reference source not found. – Error! Reference source not found.** the identity of the person making the request under the Policy's sections, the Company may request additional information to confirm the identity of the Data Subject.

The Company reserves the right to modify this Policy at any time. The Company will publish the revised Policy on its website 8 days prior to the effective date of the amendment.

Budapest, May 24, 2018

Annex: Privacy Policy of CLINICAL RESEARCH COORDINATION KFT. - The types of processed personal data in connection with certain groups of Data Subjects

Personal data includes:

- natural identity information: name, time and place of birth, mother's name, address
- official data: tax identification number or tax number, registration number for sole proprietors, social security number
- contact details: legal representative quality, position, organizational position, job title, post, other legal relationship regarding performance assistance, telephone number, e-mail address, fax number

Group of Data Subjects	Types of personal data	Legal basis and purpose of data management	Types of addressees	Data storage period
contracting party (in the case of individuals, self-employed persons);	natural identity information, official data, professional credentials, contact details	- contractual performance - legitimate interest	- authority - back-office organization*	Until the expiry of the rights and obligations arising from this contract, or until the end of the statutory retention period (if this is longer).
legal representative, employee, contact person, agent, other performance assistant (e.g. subcontractor, employee, temporary employee) of the contracting party (partner)	natural identity information, contact details	- contractual performance - legitimate interest		Until the expiry of the rights and obligations arising from this contract, or until the end of the statutory retention period (if this is longer).

* Back-office organization: company (or companies) providing financial, accounting, HR, IT and legal services to the Company