



Aquino
Consulting

Privacy Notice



Aquino Consulting Kft. Privacy Notice

1. NAME OF THE DATA CONTROLLER

Company name: Aquino Consulting Kft.

Registered office: 1097 Budapest, Könyves Kálmán körút 36.

Company registration number: 01 09 438458

Tax number: 29267310-2-43

Representative: Dr. Berki Péter

E-mail address: aquinoconsulting@aquinoconsulting.hu

Website: <https://aquinoconsulting.hu>

(hereinafter: Company)

2. DATA SECURITY MEASURES

The Company:

- protects personal data with appropriate measures against accidental or unlawful destruction, loss, alteration, damage, unauthorized disclosure, or unauthorized access;
- classifies and handles personal data as confidential information, and requires employees to observe confidentiality obligations regarding the processing of personal data;
- restricts access to personal data by assigning authorization levels;
- protects its IT systems with firewalls and ensures adequate antivirus protection;
- performs electronic data processing and record-keeping using software that meets data security requirements. The software ensures that personal data can only be accessed for specific purposes, under controlled conditions, and only by persons who need such access to perform their duties;
- ensures the monitoring of incoming and outgoing electronic communications for the protection of personal data;
- ensures the adequate physical protection of data and the devices and documents containing such data;

- ensures that only the competent administrators have access to documents that
are in the process of being worked on or processed, and stores documents containing personnel, salary, employment, and other personal data in a secure location.

3. DATA PROCESSING RELATED TO EMPLOYMENT

3.1. Employment and personnel records

Only data that is necessary for the establishment, maintenance, and termination of the employment relationship and for the provision of social welfare benefits may be requested from and kept on record for employees, and medical examinations may only be performed if they are necessary for the establishment, maintenance, and termination of the employment relationship and for the provision of social welfare benefits and do not violate the rights of the employee.

The Company processes the following data of employees for the purpose of establishing, performing, or terminating an employment relationship on the basis of the legitimate interests of the employer (GDPR Article 6(1)(f)):

1. name
2. birth name,
3. date of birth,
4. mother's name,
5. address,
6. citizenship,
7. tax identification number,
8. Hungarian health insurance (TAJ) number,
9. pensioner registration number (in the case of retired employees),
10. telephone number,
11. e-mail address,
12. ID card number,
13. official ID number confirming address,
14. bank account number,
15. online ID (if applicable)
16. start and end dates of employment,

17. job title,
18. copy of documents certifying your education and professional qualifications,
19. photograph,
20. curriculum vitae,
21. amount of wages, data related to wage payments and other benefits,
22. debts to be deducted from the employee's salary on the basis of a final decision or legislation, or written consent, and the justification for this,
23. evaluation of the employee's work,
24. the manner and reasons for termination of employment,
25. character reference, depending on the job
26. summary of job suitability tests,
27. in the case of membership of a private pension fund or voluntary mutual insurance fund, the name of the fund, its identification number and the employee's membership number,
28. passport number in the case of foreign employees; name and number of the document certifying the right to work,
29. data recorded in accident reports concerning the employee;
30. data necessary for the use of welfare services and commercial accommodation.

The employer may only process data relating to illness and trade union membership for the purpose of fulfilling the rights or obligations specified in Act I of 2012 on the Labor Code (hereinafter: Mt.). The recipients of personal data are: the employer's manager, the person exercising the employer's rights, the Company's employees performing labor tasks, and data processors.

Recipients of personal data: the employer's manager, the person exercising the employer's rights, the Company's employees performing labor-related tasks, and data processors.

Duration of storage of personal data: in accordance with the relevant legislation.

Before data processing begins, the data subject must be informed that data processing is based on the Labor Code and the enforcement of the employer's legitimate interests.

3.2. Processing of data of job applicants, applications, CVs

The scope of personal data that may be processed: the natural person's name, date and place of birth, mother's name, address, qualification data, photograph, telephone number, e-mail address, employer's notes on the applicant (if any).

Purpose of personal data processing: application, evaluation of applications, conclusion of an employment contract with the selected candidate. The data subject must be informed if the employer has not selected them for the position.

Legal basis for data processing: the consent of the data subject.

Recipients of personal data and categories of recipients: the manager authorized to exercise employer rights at the Company.

Duration of storage of personal data: Until the application has been assessed. The personal data of unsuccessful applicants must be deleted. The data of those who have withdrawn their application must also be deleted.

The employer may only retain applications on the basis of the Data Subject's explicit, unambiguous and voluntary consent, provided that their retention is necessary to achieve a data processing purpose in accordance with the law. This consent must be requested from applicants after the recruitment process has been completed.

3.3. Data processing related to the monitoring of email account use

If the Company provides an email account to an employee, the employee may use this email address and account solely for the purposes of their job, in order to keep in touch with other employees or to correspond with customers, other persons, or organizations on behalf of the employer.

The employee may not use the email account for personal purposes and may not store personal emails in the account.

The employer is entitled to check the entire content and use of the email account regularly – every 3 months – based on the employer's legitimate interest as the legal basis for data processing. The purpose of the check is to verify compliance with the employer's provisions on the use of email accounts and to verify employee obligations (Sections 8 and 52 of the Mt.).

The employer's manager or the person exercising the employer's rights is authorized to carry out the check. If the circumstances of the check do not preclude this possibility, it must be ensured that the employee is present during the check.

Prior to the inspection, the employee must be informed of the employer's interest in conducting the inspection, who may conduct the inspection on behalf of the employer, the rules governing the inspection (compliance with the principle of proportionality) and the procedure to be followed, what rights and remedies they have in relation to the data processing involved in the inspection of their email account.

The principle of proportionality must be applied during the monitoring, so it must first be determined from the email address and subject line that the email is related to the employee's job duties and not for personal purposes. The employer may examine the content of non-personal emails without restriction. If, contrary to the provisions of this notice, it is determined that the employee has used the email account for personal purposes, the employee must be requested to delete the personal data immediately. In the event of the employee's absence or lack of cooperation, the employer shall delete the personal data during the inspection. The employer may apply labour law consequences against the employee for using the email account in violation of this notice.

3.4. Data processing related to the inspection of computers, laptops, and tablets

Computers, laptops, and tablets provided by the Company to employees for work purposes may only be used by employees to perform their job duties; the Company prohibits their use for private purposes, and employees may not process or store any personal data or correspondence on these devices. The employer may check the data stored on these devices. The provisions of Section 3.3 shall apply to the employer's monitoring of these devices and the legal consequences thereof.

3.5. Data processing related to the monitoring of internet use at work

Employees may only view websites related to their job duties; the employer prohibits the use of the internet at work for personal purposes.

The Company is entitled to perform internet registrations on behalf of the Company as part of the employee's job duties, and an ID and password referring to the Company must be used during registration. If personal data is also required for registration, the Company is obliged to initiate its deletion upon termination of the employment relationship.

The employer may monitor the employee's use of the internet at work, which is governed by the provisions of Section 3.3 and its legal consequences.

4. DATA PROCESSING RELATED TO THE CONTRACT

4.1. Processing of contracting partners' data – registration of customers and suppliers

For the purpose of concluding, performing, and terminating contracts and providing contractual discounts, the Company processes the name, birth name, date of birth, mother's name, address, tax identification number, tax number, entrepreneur or primary producer ID number, personal ID number, address, registered office or business address, telephone number, email address, website address, bank account number, customer number (client number, order number), online ID (list of customers,

suppliers, regular customer lists), This data processing is considered lawful even if the data processing is necessary to take steps at the request of the Data Subject prior to entering into a contract. Recipients of personal data: the Company's employees performing customer service tasks at, employees performing accounting and tax tasks, and data processors. Duration of personal data processing: 5 years after the termination of the contract.

The Data Subject must be informed before the start of data processing that the data processing is based on the legal title of contract performance; this information may also be provided in the contract.

The Data Subject must be informed of the transfer of their personal data to the data processor.

4.2. Contact details of natural persons representing legal entity customers, buyers, and suppliers

Scope of personal data that may be processed: name, address, telephone number, email address, online ID of the natural person.

Purpose of personal data processing: performance of a contract concluded with the Company's legal entity partner, maintaining business relations, legal basis: consent of the Data Subject.

Recipients of personal data and categories of recipients: the Company's employees performing customer service tasks, employees performing accounting and tax tasks, and data processors.

Duration of storage of personal data: for 5 years following the existence of the business relationship or the status of the Data Subject's representatives.

4.3. Visitor data processing on the Company's website

Cookies are small data files that are placed on the user's computer by the website they visit. The purpose of cookies is to facilitate and make the use of the given information communication and internet service more convenient. There are many types of cookies, but they can generally be divided into two main groups. One is a temporary cookie, which the website places on the user's device only during a given session (e.g., during secure identification for online banking), and the other is a permanent cookie (e.g., a website's language setting), which remains on the computer until the user deletes it. According to European Commission guidelines, cookies [unless they are strictly necessary for the use of a given service] may only be placed on the user's device with the user's consent.

In the case of cookies that do not require the user's consent, information must be provided during the first visit to the website. It is not necessary for the full text of the cookie policy to appear on the website; it is sufficient for the website operators to briefly summarize the essence of the information and provide a link to the full policy.

In the case of cookies that require consent, the information may also be linked to the first visit to the website if the data processing associated with the use of cookies begins when the page is visited. If the use of cookies is related to a function specifically requested by the user of, the information may also be displayed in connection with the use of that function. In this case, it is not necessary to display the full text of the cookie policy on the website; a brief summary of the essence of the information and a link to the full policy is sufficient.

4.4. Information on the use of cookies

In line with common internet practice, our company also uses cookies on its website. A cookie is a small file containing a string of characters that is placed on a visitor's computer when they visit a website. When they visit the website again, the cookie enables the website to recognize the visitor's browser. Cookies can store user settings (e.g., selected language) and other information. Among other things, they collect information about the visitor and their device, remember the visitor's individual settings, and can be used, for example, when using online shopping carts. Cookies generally make it easier to use the website, help the website provide a real web experience for users and be an effective source of information, and enable the website operator to monitor the functioning of the site, prevent abuse, and ensure the smooth and adequate provision of services on the website.

When you use our website, our company records and processes the following data about you and the device you use to browse the website:

- the IP address used by the visitor,
- the type of browser,
- the characteristics of the operating system of the device used for browsing (set language),
- time of visit,
- the (sub)page, function, or service visited.

Accepting and enabling cookies is not mandatory. You can reset your browser settings to reject all cookies or to notify you when a cookie is being sent. Most browsers automatically accept cookies by default, but this can usually be changed to prevent automatic acceptance and offer you the choice each time.

However, please note that certain website features or services may not function properly without cookies.

The cookies used on the website are not suitable for identifying the user personally.

Cookies used on the Company's website:

1. Technically essential session cookies

These cookies are necessary for visitors to browse the website and use its functions and services available through the website smoothly and fully, including, among other

things, remembering the actions performed by the visitor on the given pages during a visit. The duration of data processing for these cookies is limited to the visitor's current visit; once the session is over or the browser is closed, these cookies are automatically deleted from your computer.

The legal basis for this data processing is Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.). The purpose of data processing is to ensure the proper functioning of the website.

Purpose of data processing: to ensure the proper functioning of the website.

2. Cookies requiring consent:

These allow the Company to remember the user's choices regarding the website. Visitors may prohibit this data processing at any time before and during the use of the service. This data cannot be linked to the user's identification data and cannot be transferred to third parties without the user's consent.

Our website uses Google's reCAPTCHA service to filter out malicious bots and protect forms. During the operation of reCAPTCHA, Google uses various cookies and other device identifiers to collect technical and behavioral data from the user's device (e.g., mouse movements, clicks, browser type, IP address), which may be transferred to the United States. reCAPTCHA is not considered a technical cookie essential to the functioning of the site, so the service is only loaded with the user's express consent. Without consent, reCAPTCHA will not load and an information message will appear in place of the relevant functions (e.g., forms).

For more information on how reCAPTCHA works, visit:
<https://developers.google.com/recaptcha/intro>

3. Cookies that facilitate use:

The legal basis for data processing is the visitor's consent.

Purpose of data processing: To increase the efficiency of the service, improve the user experience, and make the website more convenient to use.

The duration of data processing is 6 months.

4. Performance cookies:

Google Analytics cookies – for more information, see:
<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookieusage>

4.5. Data processing related to the newsletter service and contact

Natural persons who register for the newsletter service on the website or share their data in the Contact menu may give their consent to the processing of their personal data by ticking the relevant box. It is prohibited to pre-tick the box. The Data Subject

may unsubscribe from the newsletter or contact database at any time by submitting a written or e-mail statement, which constitutes a withdrawal of consent. In such cases, all data relating to the unsubscribing person must be deleted immediately.

The scope of personal data that can be processed: the name of the natural person (surname, first name), e-mail address.

Purpose of personal data processing:

1. Sending newsletters about the Company's products and services
2. Sending advertising material

Legal basis for data processing: the consent of the data subject.

Recipients of personal data and categories of recipients: the Company's employees performing customer service and marketing tasks, the employees of the Company's IT service provider as data processors for the purpose of providing hosting services

Duration of storage of personal data: until the newsletter service exists or until the Data Subject withdraws their consent (requests deletion).

4.6. Data processing for direct marketing purposes

Unless otherwise provided by a separate law, advertising to natural persons as the addressees of advertising by means of direct contact (direct marketing), in particular by electronic mail or other equivalent means of individual communication, may only be communicated if the recipient of the advertisement has given their prior, clear and explicit consent, with the exceptions specified in Act XLVIII of 2008.

The scope of personal data that may be processed by the Company for the purpose of contacting advertising recipients: the name, address, telephone number, e-mail address, and online identifier of the natural person.

The purpose of processing personal data is to carry out direct marketing activities related to the Company's activities, i.e. to send advertising publications, newsletters, and current offers in printed (postal) or electronic (e-mail) form on a regular or periodic basis to the contact details provided at the time of registration.

Legal basis for data processing: the consent of the data subject.

Recipients of personal data and categories of recipients: the Company's employees performing customer service tasks, the Company's IT service provider's employees performing server services as data processors, and, in the case of postal delivery, the employees of the Post Office.

Duration of storage of personal data: until consent is withdrawn.

5. DATA PROCESSING BASED ON LEGAL OBLIGATIONS

5.1. Data processing for the purpose of fulfilling tax and accounting obligations

The Company processes the data specified by law of natural persons who enter into a business relationship with it as buyers or suppliers for the purpose of fulfilling its legal obligations and complying with tax and accounting obligations (bookkeeping, taxation) prescribed by law. The data processed are, in particular, pursuant to Section 169 of Act CXXVII of 2017 on Value Added Tax: tax number, name, address, tax status, pursuant to Section 167 of Act C of 2000 on Accounting: name, address, designation of the person or organization ordering the economic operation, the person authorizing the transfer and certifying the execution of the order, and, depending on the organization, the signature of the auditor; on inventory movement documents and cash management documents, the signature of the recipient, on counterfoils, the signature of the payer, pursuant to Act CXVII of 1995 on personal income tax: entrepreneur's license number, primary producer's license number, tax identification number.

The period of storage of personal data is 8 years after the termination of the legal relationship giving rise to the legal basis.

Recipients of personal data: the Company's employees and data processors performing tax, accounting, payroll, and social security tasks.

Budapest, November 12, 2025.

Péter Berki, Dr.

CEO

Aquino Consulting Kft.