
PRIVACY POLICY

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1. PREAMBLE, OBJECTIVE OF THE RULES

- 1.1 **CABBAGE Productions Filmgyártó Studio Korlátolt Felelősségű Társaság** (Seat: 2092 Budakeszi Béke street 4., Hungary; Registration number: 13-09-097346; VAT number: 13188863-2-13.; hereinafter: „**Company**”) is a full-service film production company, which operates cabbagefilmfactory.com website (hereinafter: „**Homepage**”) to provide an opportunity for its clients or to its potential clients to browse through the services of the Company, and to offer its clients an easy way to contact the Company.
- 1.2 These rules and information on data protection (hereinafter: „**Rules**”) include the conditions of data processing of the Company. The Homepage is owned and operated by the Company. The Company, as data controller, subjects itself to the contents of these Rules, furthermore undertakes liability to that all the data management connected to its activities shall be compliant to the requirements specified in these Rules and the valid Hungarian and EU legal regulations.
- 1.3 The objective of these Rules is that in the whole scope of services provided by the Company, the user can be assured of that – regardless of the user’s sex, nationality or home address – the user’s rights and basic rights of freedom, such as especially their right to private life will be respected while their personal data is processed electronically (data protection). The Company shall process the recorded personal data in confidence, by complying with the legal regulations and international recommendations on data protection and these Rules on data protection.

2. INTERPRETATION OF THE RULES, DEFINITIONS

- 1.4 These Rules shall be interpreted based on the principles of English language in consideration of the general legal principles of the Hungarian civil law. When interpreting these Rules, the words and phrases written in capital letters shall have the meaning conferred to them on their first place of appearance in the Rules – independently of their tense, mode and case, or whether they are singular or plural.
- 1.5 In harmony with the provisions of Act CXII of year 2011 on the right to possess personal data and the freedom of information (hereinafter: „**Info Law**”) and the Regulation (EU) 2016/679 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 (hereinafter: „**GDPR**”) where it cannot be interpreted otherwise based on the context, the terms used in low-case letters in these Rules shall mean the following:

affected person/user any person or any specified person identified or that can be identified – either directly or indirectly – based on personal information that contact the Company via the Homepage, or any person specified above using the Homepage;

business advertisement information, statement, method of appearance, aimed at promoting the sales or other usage of marketable movables that can be possessed – including money, securities and financial assets and natural resources that can be utilized as things – (hereinafter jointly: the product), services, real estates, rights constituting asset value (hereinafter all of these jointly: goods) or, in connection with this objective, aimed at popularizing the name, trademark, activities of the corporation or goods or brands;

controller	means the Company which, alone or jointly with others, determines the purposes and means of the processing of personal data;
consent/ approval	of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
data processing	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
data management	fulfilling technical tasks connected to data processing operations independently of the method and tools used for their realization and the place of usage, provided that the technical tasks are realized with data;
destruction	the complete physical destruction of data carrier containing the data;
data transfer	making the data available to a specified third party;
data erasure	making data unrecognizable in a way that their restoring is not possible any longer;
data blocking	providing data with identification marking in order to limit its further management definitely or for a specified period; instead of erasure, the Company blocks the data where the definite erasure of the data would breach the lawful interests of the affected person; blocked data shall be treated exclusively as long as the objective of data management exists, which excluded the erasure of the personal or sensitive data;
disclosure	making the data available to anyone;
objection	the statement of the affected person by objecting the processing of its personal data and by which it requests the erasure of the processed data;
personal data	means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
personal data breach	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed
personal identification data	the first and last name, maiden name, of the affected person, its sex, place and date of birth, its mother's birth first name and last name, permanent address,

place of stay, social security identification mark jointly or any of them which is or may be suitable for identifying the affected person;

pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person

processor means a natural or legal person, public authority, agency or other body which manages personal data on behalf of the controller;

sensitive data personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

supervisory authority means the authority which is responsible for personal data and the freedom of information in Hungary, the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information) (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/. Mail address: 1387 Budapest Pf 40.)

third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

1.6 If it is not concluded differently from the text otherwise:

- (a) reference to any legal regulations in these Rules includes the incidental later modified, expanded, uniform structure of the legal regulation in question;
- (b) in these Rules the titles and paragraph numbers serve exclusively reference and they shall be considered only together with the interpretation of the text of these Rules;
- (c) all references to a person in these Rules mean reference to any person, company, association, government, state, state institution or authority;
- (d) any of the provisions of these Rules shall not be interpreted in a way that it would exclude the liability or legal remedy for fraudulent statements or procedures or statements or procedures made or initiated in bad faith.

3. NAME AND CONTACT INFORMATION OF THE CONTROLLER

1.7 Name of the Company as controller: **CABBAGE Productions Filmgyártó Stúdió Korlátolt Felelősségű Társaság**

1.8 Seat of the controller: 2092 Budakeszi, Béke utca 4.

1.9 Mail (postal) address of the controller: 2092 Budakeszi, Béke utca 4.

- 1.10 Registration number of the controller: 13-09-097346
- 1.11 VAT number of the controller: 13188863-2-13
- 1.12 E-mail address of the controller: info@cabbage.hu The affected person shall acknowledge that the Company will receive only the questions, complaints of the affected person relating to its own data processing or to these Rules at the above e-mail address.

4. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

- 1.13 The Company shall use and store the personal data provided by the user lawfully, fairly and in a transparent manner only for specified purposes determined in these Rules.
- 1.14 The process of the personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 1.15 The processed personal data shall be accurate and, where necessary, kept up to date. Every reasonable step must be taken by the Company to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- 1.16 The processed personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- 1.17 The personal data shall be processed by the Company in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
- 1.18 The Company shall be responsible for, and be able to demonstrate compliance with the provisions of this paragraph.

5. OBJECTIVE OF DATA PROCESSMENT, SCOPE OF PROCESSED DATA, AND DURATION OF DATA PROCESSING

1.19 Personal data provided on the Homepage operated by the Company

5.1.1 The Company as data controller shall be entitled to process the following personal data subject to the freely given, specific, informed and unambiguous consent of the affected person contacting the Company through the Homepage:

- (a) first and last name
- (b) e-mail

1.1.2 The purpose of processing the above listed personal data is that the Company

- (a) can reply to the inquiry sent by the affected person;
- (b) can provide online communication between the affected person and the Company via sending messages, e-mail messages, newsletters;
- (c) can present its services to affected person interested.

1.1.3 Processing of the above listed personal data starts with the acceptance of these Rules and it will last until the user withdraws its consent to processing its personal data.

- 1.1.4 The Company processes data pursuant to provisions of Info Law and GDPR based on the users freely given, specific, informed and unambiguous consent.
- 1.1.5 **By providing the required personal data and checking the “checkbox” the affected person expressly accepts the provisions of these Rules and expressly approves the data processing specified above.**
- 1.1.6 It is the voluntary decision of the affected person whether or not to give the personal data included in this paragraph of the Rules to the Company.

1.2 Data processing on the Homepage of the Company, cookie policy

- 1.2.1 The system used by the Company will identify the computer of the person browsing the Homepage by so-called cookies. In order that all contents of the Homepage can be viewed, the user should approve the cookies. Therefore, when downloading certain parts of the Homepage, cookies will be placed on the user’s computer, which are necessary for the operation of each function of the Homepage. Cookies are small text files, which are saved by the computer and the browser and the user will not receive any information on that from the Company. Cookies are not suitable for identifying the person of the user and they live only during the session. The objective of the Company with placing the cookies is to send essential information to the visitors in a targeted way. The above information shall be used by the Company exclusively for the operation of the Homepage, and for marketing and statistical purposes.
- 1.2.2 While using the Homepage, technical information is recorded (e.g. in the form of log files, which include the user’s IP address, the date and time, the URL of the visited page). The system logs such information continuously, but it will not connect it to the information provided during usage. The users will not but only the Company will access to information collected in this way. The Company shall use the above information exclusively for the technical operation and for statistical purposes.
- 1.2.3 The Company informs the user that during the usage of the Homepage no process of sensitive data takes place.
- 1.2.4 Type of cookies used by the Company:

Preferences	Details
<p>Required/Strictly Necessary</p> <p>These technologies are required to enable core functionality of the Homepage.</p>	<p>Strictly necessary cookies or similar technologies are essential in order to enable to access the Homepage and to use its features. If user disable these technologies, some or all of the features of the Homepage may not work.</p>
<p>Performance</p> <p>These technologies allow the Company to analyze usage of the Homepage so the Company can measure and improve performance.</p>	<p>Performance cookies or similar technologies collect information about how user use the Homepage, so that Company can analyze traffic, understand users' interactions, and improve Homepage.</p>

Functionality

These technologies allow the Company to provide enhanced functionality and more personalized features.

Functionality cookies or similar technologies allow the Company to remember choices the user make and provide enhanced, more personalized features and content and a better user experience.

Targeted Advertising

These technologies are used by advertising companies to serve ads that are relevant to users interests.

Advertising cookies or similar technologies. The Company may use a third-party advertising network, or an affiliated company, or a Social Media Site to deliver targeted advertising. They may also have the capability to track the users browsing or usage across the Homepage.

1.2.5 The user by using the Homepage and approving the given cookie expressly acknowledges that the Homepage uses the given cookie for the purposes specified in present Rules. The user may adjust its browser to reject cookies from the Company or from any other website. Controlling cookies via browser controls may not limit the use of other technologies. The user shall consult its browser's settings for more information. Blocking cookies or similar technology might prevent the user from accessing some of the content of the Homepage.

1.3 The Company may request the affected person to provide personal data other than the personal data specified above. In this case the Company shall specify the purpose of data processing before requesting so.

1.4 **The Company shall process the personal data provided by the affected person until it has withdrawn its approval. Such personal data shall be erasure by the Company immediately but within 5 (five) working days the latest from the request of the affected person.**

1.5 Furthermore, the Company shall process any personal or sensitive data based on the power provided by law. In case the Company process personal or sensitive data of the affected person pursuant to any provisions of law, then the Company shall inform the affected person on such data management operation, the purpose and duration of the operation by also specifying the legal reference. Before requesting any personal data, the Company shall inform the affected person that the provision of the data in question is voluntary and based on the approval of the affected person or it is compulsory and it is based on legal regulations.

1.6 By accepting the Rules, the affected person shall acknowledge that the Company shall be entitled to use the personal data for statistical purposes in a way that the data shall be deprived of its relationship to the affected person. The Company undertakes that it will be impossible to connect such data to any of the affected persons after their statistical processing.

1.7 **At specified frequency, the Company may send to the users newsletters, e-mail messages, geo-localization messages and marketing and advertisement messages on the operation of the Homepage, and in connection with the activities and services of the Company. By accepting these Rules, the user approves expressly that the Company sends messages as specified above. The user shall be entitled to withdraw the above approval at any time by clicking on the correct icon on the Homepage, or in the newsletter sent by the Company.**

2. ACCESS TO THE PROCESSED DATA, DATA MANAGEMENT AND DATA TRANSFER

- 2.1 Primarily the Company and the internal employees of the Company shall be entitled to know the personal data and they shall not publish or disclose the personal data to any third parties and they shall use the personal data for the purposes specified in the Rules.
- 2.2 Within the scope of operation of its information system, the Company may use the services of a data processor person (e.g. system operator, system administrator). In this case the Company is obliged to inform the users by sending them the modified Rules in which the processors are listed.
- 2.3 The Company shall be entitled to transfer the user's personal data to its subcontractors. Before selecting its partners, the Company prepared such selections with utmost care. Such partners shall treat the confidential information acknowledged by them when fulfilling their liabilities and providing their services, subject to the provisions of legal regulations.
- 2.4 Without clear legal permission the Company shall be entitled to transfer identifiable personal data to third party based on the affected user freely given, specific, informed and unambiguous consent.

3. DATA SECURITY

- 3.1 The Company shall ensure data security such as especially their protection from unauthorized access, change, transfer, publication, erasure or destruction and accidental destruction or damages.
- 3.2 The Company shall take all the measures necessary for ensuring the safety of personal data given by the users on the Homepage during network communication, data storage and guarding. Access is strictly limited to personal data in order that illegal learning, illegal change and usage of personal data can be prevented. The information system and network of the Company is protected appropriately against fraud, spying, sabotage, vandalism, fire, flood, computer bugs, computer breaking that might take place during computer usage.
- 3.3 When processing data, the Company shall preserve (1) secrecy: the Company protects personal data in a way that access to it can be possible to persons that are authorized to do so; (2) integrity: the Company protects the integrity and the accuracy of processing of personal data.

4. RIGHTS OF THE USERS

- 4.1 The affected persons rights related to the processing of personal data are the following

4.1.1 Right of information and access to personal data

The affected person shall have the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (i) the purposes of the processing;
- (ii) the categories of personal data concerned;
- (iii) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (v) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

- (vi) the right to lodge a complaint with a supervisory authority;
- (vii) where the personal data are not collected from the affected person, any available information as to their source;
- (viii) the existence of automated decision-making, including profiling, referred and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the affected person.

Where personal data are transferred to a third country or to an international organization, the affected person shall have the right to be informed of the appropriate safeguards pursuant relating to the transfer.

The Company shall provide a copy of the personal data undergoing processing. For any further copies requested by the affected person, the controller may charge a reasonable fee based on administrative costs. Where the affected person makes the request by electronic means, and unless otherwise requested by the affected person, the information shall be provided in a commonly used electronic form.

4.1.2 **Right of rectification of personal data**

The affected person shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the affected person shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4.1.3 **Right of erasure of personal data**

The user shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies

- (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (ii) the user withdraws consent on which the processing is based according to point, and where there is no other legal ground for the processing;
- (iii) the user objects to the processing pursuant;
- (iv) the personal data have been unlawfully processed;
- (v) the personal data have to be erased for compliance with a legal obligation in EU or Hungarian law to;
- (vi) the personal data have been collected in relation to offer of information society services directly to a child.

4.1.4 **Right to restriction of processing**

The affected person shall have the right to obtain from the Company restriction of processing where one of the following applies:

- (i) the accuracy of the personal data is contested by the affected person, for a period enabling the Company to verify the accuracy of the personal data;
- (ii) the processing is unlawful and the affected person opposes the erasure of the personal data and requests the restriction of their use instead;
- (iii) the Company no longer needs the personal data for the purposes of the processing, but they are required by the affected person for the establishment, exercise or defense of legal claims;
- (iv) the affected person has objected to processing pursuant pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the affected persons consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the EU or of Hungary.

An affected person who has obtained restriction of processing shall be informed by the Company before the restriction of processing is lifted.

4.1.5 **Right to data portability**

The affected person shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- (i) the processing is based on consent pursuant to point or on a contract pursuant to point
- (ii) the processing is carried out by automated means.

4.1.6 **Right to object**

The affected person 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, including profiling. The Company shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the affected person or for the establishment, exercise or defense of legal claims.

4.2 The affected person can exercise his/her above listed rights on one of the following contacts:

Name: **CABBAGE Productions Filmgyártó Stúdió Korlátolt Felelősségű Társaság**

Seat: 2092 Budakeszi Béke street 4.

E-mail: info@cabbage.hu

4.3 The Company shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company shall inform the affected person about those recipients if the data subject requests it.

5. **OBLIGATIONS OF THE USERS**

5.1 The affected person shall provide true, authentic personal data and – if any of the pieces of data is changed – shall correct the personal data or ask the Company to correct the information.

5.2 The Company, without any further notice, reserves the right to itself to erasure the data of an affected person that abuses the personal data of another person.

5.3 By accepting the Rules, the affected person shall acknowledge that during the usage of the Homepage, he/she shall not share content or shall not send messages, which

- (i) breaches other people's honor, dignity;
- (ii) impeaches other persons for their national, ethnic origin race, affiliation to a religious group or presumed debt;
- (iii) impeaches any services, business companies, without grounds, in bad faith or with the aim of discrediting.

5.4 The Company will erasure such personal data immediately and call the affected person to fulfil the above requirements. Should the affected person behave in the same way, by breaching the above rules after the notice, the Company, without any further notice, reserves the right to itself to erasure the data of the affected person.

6. RECORDS OF PROCESSING ACTIVITIES

6.1 The Company shall be obliged, and the Company representative, shall maintain an electronic record of processing activities under its responsibility. That record shall contain all of the necessary information prescribed in GDPR and Info Law.

6.2 The Company and the Company representative shall make the record available to the supervisory authority on request

7. PERSONAL DATA BREACH

7.1 In the case of a personal data breach, the Company shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay

7.2 When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Company shall communicate the personal data breach to the affected person without undue delay.

7.3 The communication to the affected person referred person shall describe in clear and plain language the nature of the personal data breach and contain at least the following information and measures referred to in points (b), (c) and (d) of Article 33(3).

- (i) the name and contact details of the data protection officer or other contact point where more information can be obtained;
- (ii) the likely consequences of the personal data breach;
- (iii) the measures taken or proposed to be taken by the Company to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

7.4 The communication to the affected person shall not be required if any of the following conditions are met:

- (i) the Company has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- (ii) the Company has taken subsequent measures which ensure that the high risk to the rights and freedoms of affected person is no longer likely to materialise;
- (iii) it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the affected persons are informed in an equally effective manner.

7.5 If the Company has not already communicated the personal data breach to the affected person, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred to in clause 11.4. are met

8. LEGAL REMEDY

8.1 If the affected person believes that the Company by the data processing realised by itself breached these Rules or the prevailing legal regulations, then, in order to stop the presumed unlawful data processing, the affected person shall contact Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information) (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/. Mail address: 1387 Budapest Pf. 40.).

8.2 The affected person shall be entitled to initiate a legal procedure against the Company where it believes that the rights regulated the Rules are breached by the Company. The court shall act in urgency. The tribunal shall have jurisdiction in the litigation – according to the affected person’s decision – based on the home address of the affected person or the seat of the Company.

9. MODIFICATION, INTERPRETATION, EFFECTIVE DATE OF THE RULES

9.1 With sending electronic notice to the affected persons – the Company reserves the right to itself to modify these Rules unilaterally. By using the Homepage after the effective date of the modification, the affected person shall accept the modified Rules.

9.2 The Company states that all the modifications of the Rules will be compliant to the provisions on data protection of the legal regulations in effect on the date of modification.

9.3 The Company states that the Rules must be interpreted in harmony with the legal regulations in effect on the date of interpretation of the Rules. Should there be discrepancies between the Rules and the legal regulations in effect, the provisions of the legal regulations in effect shall be ruling.

9.4 The effective date of these Rules is 2023.06.27.