
Privacy and Data Processing Policy

updated: 01 May 2025

1. Identification of the Data Controller

ROLLA METAL Zrt. by Shares (registered seat: 2310 Szigetszentmiklós, Petőfi Sándor utca 137, company registration number: 13-10-041300, tax number: 10935817-2-13, email: rolla@rolla.hu, phone: +36 24 887 250, represented by: Mr. Lajos Szántó, Chief Executive Officer; hereinafter referred to as the "Data Controller") provides the following information to its clients and partners regarding its data processing practices, in accordance with the applicable legislation on the protection of personal data, in particular 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, repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: "GDPR"), and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: "Infotv.").

2. Purpose and Legal Basis of the Policy

The Data Controller places special emphasis on the protection of the personal data of its customers and partners and is committed at all times to ensuring the fair and transparent processing of such data. This Privacy Notice (hereinafter: "Privacy Notice") provides information on the data processing activities carried out by the Data Controller in the course of providing its services, including, in particular, the sources and scope of the personal data collected, the legal basis, purpose, and duration of the processing, the data subject's rights, available legal remedies, and the options available for exercising those rights. It also contains the contact details through which data subjects may receive answers to questions related to the Data Controller's data protection practices.

The Data Controller's data processing activities include:

- maintaining communication between the Data Controller and the Data Subject;
- processing personal data in connection with the preparation of individual, personalised offers;
- data processing related to contract formation and performance;
- processing data related to the handling of complaints;
- and fulfilling legal obligations regarding document retention, particularly in connection with visitors to the website www.rolla.hu (hereinafter: the "Website"), who are also considered Data Subjects.

3. Definitions

Personal Data:

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.

Processing:

Any operation or set of operations performed on personal data or 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 Controller:

A natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, such law may also determine the controller or the specific criteria for its nomination.

Data Processor:

A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Data Controller.

4. Identification of the Service Provider as Data Controller

Name: ROLLA METAL Zrt. by Shares

Registered Seat: 2310 Szigetszentmiklós, Petőfi Sándor utca 137

Mailing Address: 2310 Szigetszentmiklós, Petőfi Sándor utca 137

Email: rolla@rolla.hu

5. Scope of Personal Data Processed, Purpose, Legal Basis, and Duration of Processing

Data processing based on communication initiated between the Data Controller and the Data Subject:

Purpose of data processing:	Communication between the Data Controller and the Data Subject. The purpose of automatically recorded data is statistical analysis, technical development of the IT system, and the protection of the Data Subject's rights.
Legal basis of data processing:	The Data Subject's consent \[Article 6(1)(a) of the GDPR], which may be withdrawn at any time.
Scope of data processed:	The Data Subject's surname; given name; email address; phone number; in case of an inquiry, the subject and content of the message; in the case of newsletter subscription: the name, registered seat, and field of activity of the company represented by the Data Subject, website usage behavior, newsletter reading behavior, and purchasing behavior. Technically recorded data during system operation: data generated by the Data Subject's login device during use of the service, automatically recorded by the Data Controller's system as part of technical processes. These data are logged automatically upon login and logout without any declaration or action by the Data Subject. Such data may not be linked to other personal user data, except where required by law. Access to these data is restricted exclusively to the Service Provider.

Duration of data processing:	Until the withdrawal of the Data Subject's consent, or in the absence of such withdrawal, for the full duration of the service provided by the Data Controller to the Data Subject, and thereafter for the general limitation period of 5 years applicable to civil law claims.
Data Processors:	For the purpose of storing data related to the sending and receiving of messages, the Data Controller uses the Outlook email application within the Microsoft 365 software suite.

Processing for the purposes of fulfilling the Data Controller's obligation to keep records:

Purpose of data processing:	Fulfilment of the Data Controller's obligation to retain accounting documents.
Legal basis of data processing:	Fulfilment of the legal obligation applicable to the Data Controller \[pursuant to Article 6(1)(c) of the GDPR].
Scope of data processed:	Name and address of the Data Subject, accounting document supporting financial records.
Duration of data processing:	The Data Controller is obligated to retain accounting documents that directly or indirectly support financial records closely related to the provision of its services. Accordingly, the Data Controller must retain the personal data related to the fulfilment of its document retention obligations for eight years \[pursuant to Section 169 § of Act C of 2000 on Accounting].
Data Processors:	<p>Rolla Iparipark Zrt. (2310 Szigetszentmiklós, Petőfi S. u. 137.) Purpose of data processing: processing of market research data related to the Data Processor's own real estate development activities.</p> <p>SL Asset Holding Zrt. (2310 Szigetszentmiklós, Petőfi S. u. 137.) Purpose of data processing: coordination of internal market research activities within the corporate group.</p> <p>Westag Hungária Kereskedelmi Kft. (2310 Szigetszentmiklós, Petőfi S. u. 137.) Purpose of data processing: processing of market research data related to the Data Processor's own real estate development.</p> <p>Bergmann Könyvelő Iroda Kft. (1138 Budapest, Váci út 186.) Purpose of data processing: accounting services, accounting.</p> <p>Signator Audit Kft. (8200 Veszprém, Radnóti tér 2.) Purpose of data processing: Audit activity</p>

	<p>Certis Kft. (1126 Budapest, Szendrő u. 30. II/1.) Purpose of data processing: Maintenance of the IT system</p> <p>Mucius Scaevola Kft. (1106 Budapest, Maglódi út 6.) Purpose of data processing: maintenance of the web-based IT system, organisation of market research data, and forwarding of such data to the Data Controller.</p>
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Summary of the Data Controller's processing for complaint handling purposes:

Purpose of data processing:	Investigation of the complaint filed by the Data Controller on behalf of the Data Subject.
Legal basis of data processing:	Fulfilment of the legal obligation applicable to the Data Controller \[Article 6(1)(c) of the GDPR].
Scope of data processed:	Complaint ID; place and date of submission; method of submission; list of documents, records, and other evidence submitted by the Data Subject; content of the complaint; content of the official record; response to the complaint; essential details of the service; surname of the Data Subject; given name of the Data Subject; email address of the Data Subject; phone number of the Data Subject.
Duration of data processing:	The Data Controller is required to retain the processed data — in particular, the official record of the complaint submitted by the Data Subject and a copy of the response — for a period of three years \[pursuant to Section 17/A (7) of Act CLV of 1997 on Consumer Protection].

Data processing related to extraordinary events and accidents by the Data Controller:

Purpose of data processing:	Handling of extraordinary events and accidents (e.g. damage, theft, etc.) occurring at the registered office of the Data Controller, including the recording of the circumstances of the incident in an official report for the purpose of enforcing claims.
Legal basis of data processing:	The Data Subject's consent pursuant to Article 6(1)(a) of the GDPR. In the case of enforcement of the legitimate interests of the Data Controller or a third party, pursuant to Article 6(1)(f) of the GDPR.
Scope of data processed:	Location and time of the incident, estimated extent of the damage, manner in which the damage occurred, name, address, and phone

	number of the injured party, submitted claim for compensation, names, addresses, and phone numbers of witnesses, signatures of the liable party, the injured party, and the witnesses.
Duration of data processing:	The Data Controller retains the processed data — in particular, the official report — for a period of five years.

Data processing related to personal data provided by the contractual partners of the Data Controller:

Purpose of data processing:	Exercise of rights and fulfilment of obligations arising from contracts concluded by the Data Controller with its contractual partners.
Legal basis of data processing:	The Data Subject's consent pursuant to Article 6(1)(b) and (f) of the GDPR.
Scope of data processed:	Personal data included in the contracts (name and position of the person authorised to represent the contracting partner, their contact details and signature; where applicable, the name of the contact person, their job title at the partner company, email address, and phone number).
Duration of data processing:	The Data Controller retains the contract containing the data for 5 years after its termination, or for 8 years in the case of a contract serving as the basis for payment.

Data processing on the Website operated by the Data Controller:

Purpose of data processing:	The Data Controller operates the website under the www.rolla.hu domain www.rolla.hu. The purpose of data processing is to promote the Data Controller's services, products, and special offers to prospective clients.
Legal basis of data processing:	Through the interface available on the Website, the Data Subject may contact the Data Controller by providing their name, telephone number, and email address, thereby consenting to the Data Controller initiating contact and sending them email messages. The Data Subject's consent \[pursuant to Article 6(1)(a) of the GDPR] may be withdrawn at any time.
Scope of data processed:	At registration: the Data Subject's surname; given name; email address; field of expertise; name and registered seat of the company represented by the Data Subject.

Duration of data processing:	Until the withdrawal of the Data Subject's consent, or in the absence of such withdrawal, for the entire duration of the service provided by the Data Controller to the Data Subject, and thereafter for the general limitation period of 5 years applicable to civil law claims.
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6. Method of Storing Personal Data and Data Security

The personal data processed may be accessed and handled solely by the Data Controller and those of its employees whose job responsibilities include tasks related to the specific purpose of the data processing.

Taking into account the state of scientific and technological advancement, the cost of implementation, as well as the nature, scope, context, and purposes of the data processing, and the varying probability and severity of risks to the rights and freedoms of natural persons, the Data Controller implements appropriate technical and organizational measures to ensure a level of data security appropriate to the level of risk.

The Data Controller stores personal data in locked and secured form either on devices located at its registered office and/or on paper, in order to prevent unauthorised access. Access to the Data Controller's IT equipment is protected by password. The Data Controller's computer systems are equipped with adequate security protection and are regularly monitored.

7. Cookies

A cookie is a file (data string) that may be created on the visitor's computer, mobile phone, or other device with internet access by the program that displays the website. The cookie is sent by the web server to the Data Subject's browser, which then returns it to the server.

Cookies contain only data; they do not include executable files, viruses, or spyware, and they do not access data stored on the Data Subject's hard drive. (A cookie is an encrypted data string — a path — that can only be interpreted in conjunction with the specific server. The Data Subject's actual data is stored on the server, not in the cookie itself.)

The website www.rolla.hu is a static website consisting of a fixed number of pages with fixed content; no interaction takes place between the site and the Data Subject.

Types and functions of cookies used on the website:

Third-party cookies:

These are statistical cookies used via the Google Analytics service.

Google Analytics is a simple, easy-to-use tool that helps website owners measure how users interact with website content. As the Data Subject navigates between pages, Google Analytics provides the website owner with JavaScript tags (libraries) that record information about the viewed page, such as the page's URL.

For the purpose of collecting data on website usage, we use the following Google Analytics (GA) cookies:

Cookie Name	Type	Purpose	Duration
_gid (Google Analytics)	Statistical	Analysis of website operation and usage; data collection	24 hours
_gat (Google Analytics)	Statistical		1 minute
_ga (Google Analytics)	Statistical		400 days

Further information about Google Analytics cookies is available at the following link:

<https://support.google.com/analytics/answer/6004245?hl=hu>

8. Newsletter and Personalized Newsletter

The Data Controller places particular emphasis on the lawful use of the email addresses it manages and uses them only in the manner defined below—for sending informational or promotional emails related to its products.

The primary purpose of processing email addresses is to identify the Data Subject and to maintain communication during order fulfillment and the use of services. Accordingly, email communication primarily serves this purpose.

In the event of changes to the services provided by the Data Controller or to the General Terms and Conditions (hereinafter: “GTC”), the Data Controller may inform the Data Subjects about such changes and similar services via email. However, such notifications are not used for advertising purposes.

The Data Controller sends advertising or promotional messages (newsletters) to the email addresses provided during registration only with the explicit consent of the Data Subject, and only in accordance with applicable legal regulations. The newsletter contains direct marketing content and advertisements. During newsletter delivery, the Data Controller processes the data provided by the Data Subject.

With respect to newsletters, the Data Controller processes the data provided by the Data Subject at the time of subscription until the Data Subject requests removal from the subscription list via email or post. Upon unsubscribing, the Data Controller will no longer send newsletters or offers to the Data Subject. The Data Subject may unsubscribe at any time free of charge and may also withdraw consent.

The Data Controller may also use the personal data of the Data Subject to send them personalized offers in the form of newsletters. As part of the personalized newsletter service, the Data Controller reviews the past purchases of registered and subscribed Data Subjects and may send customized newsletters based on this analysis. The same provisions apply to unsubscribing from personalized newsletters as for regular newsletters. If the Data Subject unsubscribes from the newsletter, they will no longer receive personalized newsletters either.

9. Rights of the Data Subject in Relation to Data Processing

The Data Subject may exercise the rights set out in this section by contacting the Data Controller via email at rolla@rolla.hu or by sending a written request by post to the registered seat of the Data Controller.

The Data Controller may not refuse to comply with a request by the Data Subject to exercise their rights, unless it can demonstrate that it is not in a position to identify the Data Subject.

The Data Controller shall assess the request without undue delay and, in any case, within one month of receipt. It shall record the request and inform the Data Subject of any action taken as a result of the request. Where necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The Data Controller shall inform the Data Subject of any such extension within one month of receiving the request, stating the reasons for the delay. If the request was submitted electronically, the response shall also be provided electronically, where possible, unless the Data Subject requests otherwise.

If the Data Controller does not take action on the Data Subject's request, it shall inform the Data Subject without delay, and at the latest within one month of receipt of the request, of the reasons for not taking action and of the possibility to lodge a complaint with a supervisory authority and to seek judicial remedy.

The provision of information, notifications, and actions shall be free of charge. If the request is clearly unfounded or excessive—particularly due to its repetitive nature—the Data Controller may charge a reasonable fee based on administrative costs, or may refuse to act on the request. The burden of demonstrating that a request is clearly unfounded or excessive rests with the Data Controller.

Where the Data Controller has reasonable doubts concerning the identity of the natural person making the request, it may request additional information necessary to confirm the identity of the Data Subject.

Right to Information:

The Data Controller shall take appropriate measures to ensure that the Data Subject is provided with all information referred to in Articles 13 and 14 of the GDPR and all notifications pursuant to Articles 15–22 and 34 in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

Right of Access (Article 15 of the GDPR):

The Data Subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the data processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where applicable, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the Data Controller rectification or erasure of personal data, or restriction of processing concerning the Data Subject, or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the Data Subject, any available information as to their source;
- the existence of automated decision-making, including profiling, 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 Data Subject.

The Data Controller shall provide the Data Subject with a copy of the personal data undergoing processing. For any further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the request is made by electronic means, the information shall be provided in a commonly used electronic format, unless otherwise requested by the Data Subject. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Right to Rectification (Article 16 of the GDPR):

The Data Subject has the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the Data Subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to Erasure (“Right to Be Forgotten”) (Article 17 of the GDPR):

The Data Subject has the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay, and the Data Controller is obliged to erase such data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the Data Subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- the Data Subject objects to the processing, and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased to comply with a legal obligation under Union or Member State law to which the Data Controller is subject;
- the personal data have been collected in relation to the offer of information society services.

The erasure of personal data shall not be required to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing under Union or Member State law to which the Data Controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, insofar as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise, or defense of legal claims.

Right to Restriction of Processing (Article 18 of the GDPR):

The Data Subject has the right to obtain from the Data Controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the Data Subject, in which case the restriction applies for a period enabling the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the data and requests the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise, or defense of legal claims; or

- the Data Subject has objected to processing; in this case, the restriction shall apply for the period during which it is verified whether the legitimate grounds of the Data 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 Data Subject's 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 Union or of a Member State.

The Data Controller shall inform the Data Subject who has obtained restriction of processing in accordance with the above before the restriction is lifted.

Right to Data Portability (Article 20 of the GDPR):

The Data Subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used, and machine-readable format, and has the right to transmit those data to another controller without hindrance from the Data Controller, where:

- the processing is based on consent or on a contract; and
- the processing is carried out by automated means.

In exercising the right to data portability as described above, the Data Subject also has the right to request the direct transmission of the personal data from one controller to another, where technically feasible.

The exercise of this right shall not adversely affect the rights and freedoms of others, nor shall it prejudice Article 17 of the GDPR. This right shall not apply where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

Right to Object (Article 21 of the GDPR):

The Data Subject has the right to object, on grounds relating to their particular situation, at any time to the processing of personal data concerning them that is based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions. In such cases, the Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the Data Subject, or for the establishment, exercise, or defense of legal claims.

Right to Withdraw Consent:

Where the processing of personal data is based on the Data Subject's consent, the Data Subject shall have the right to withdraw their consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

The rights and remedies related to data processing are detailed in Chapters III and VIII of the GDPR, and in Chapters 13–17 and 30 of the Hungarian Infotv. (Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information).

10. Legal Remedies

The Data Subject may contact the Data Controller at any time in relation to the processing of their personal data (address: 2310 Szigetszentmiklós, Petőfi Sándor utca 137; email: novoferm@novoferm.hu); however, this is not mandatory.

If the Data Subject believes that the Data Controller has violated their right to the protection of personal data, or has engaged in unlawful data processing, they may initiate proceedings with the National Authority for Data Protection and Freedom of Information (NAIH).

Contact details of NAIH:

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf.: 9.

Email: ugyfelszolgalat@naih.hu

Phone: +36 1 391 1410

Website: www.naih.hu

The Data Subject also has the right to bring the matter before a court in order to protect their data. In such cases, they may freely choose whether to file the claim with the court competent based on their place of residence (permanent address), place of stay (temporary address), or the seat of the Data Controller.

The competent court based on place of residence or stay can be found at: <http://birosag.hu/ugyfelkapcsolatiportal/birosag-kereso>.

For cases related to the seat of the Data Controller, the competent court is the Budapest Environs Regional Court.

11. Other Provisions

The Data Controller may not use the provided personal data for purposes other than those specified in this Policy. Disclosure of personal data to third parties or authorities is only possible with the prior, explicit consent of the Data Subject, unless otherwise required by binding law.

The Data Controller does not verify the personal data provided. The person providing the data is solely responsible for the accuracy of the information submitted. By providing an email address, the Data Subject assumes responsibility that the services will be used exclusively by them through the provided address. Accordingly, any liability related to the use of services via the specified email address shall rest solely with the Data Subject who registered that address.

The processing of personal data provided during registration begins upon registration and continues until the data is deleted at the request of the Data Subject. In the case of non-mandatory data, processing starts from the time of data submission and lasts until the specific data is deleted upon request. Deletion by the Data Subject or the Service Provider may occur at any time under the conditions set out in section 9.

The system stores logged data for 6 months from the time of logging, except for the date of last visit, which is automatically overwritten.

The above provisions do not affect the fulfillment of legal data retention obligations (e.g., those arising from accounting regulations), nor do they affect data processing based on further consents given during website registration or by other means.

For the operation of the underlying IT system, fulfillment of orders, and settlement of accounts, the Data Controller may use data processors (e.g., system operators, delivery companies, accountants).

Names of Data Processors:

Company Name	Address	Activity	Company Registration Number
Rolla Iparipark Zrt.	2310 Szigetszentmiklós, Petőfi Sándor u. 137.	Real estate development	13-10-042301
Westag Hungária Kft.	2310 Szigetszentmiklós, Petőfi Sándor u. 137.	Real estate development	13-09-159025
SL Asset Holding Zrt	2310 Szigetszentmiklós, Petőfi Sándor u. 137.	Holding management	13-10-041864
Signator Audit Kft.	8200 Veszprém, Radnóti tér 2.	Audit services	19-09-500315
Certis Kft.	1126 Budapest, Szendrő u. 30. II/1.	IT system maintenance	01-09-702346
Bergmann Könyvelőiroda Kft.	1138 Budapest, Váci út 186.	Accounting office	01-09-736645
Mucius Scaevola Kft.	1106 Budapest, Maglódi út 6.	Web development	15-09-084108

The Data Controller maintains a register for the purpose of monitoring actions taken in response to data protection incidents and informing the Data Subject. This register includes the scope of personal data affected, the number and categories of Data Subjects involved in the incident, the date, circumstances, and effects of the data protection incident, the measures taken to address it, and any other data required by applicable data protection laws.

The Data Subject may exercise their rights by contacting the Data Controller at the postal address 2310 Szigetszentmiklós, Petőfi Sándor utca 137, or via email at rolla@rolla.hu.

If the Data Subject provides third-party data during registration for the use of services or causes damage in any way while using the Website, the Data Controller is entitled to seek compensation for the damage caused. In such cases, the Data Controller will provide all reasonable assistance to the competent authorities in identifying the person responsible for the violation.

The Data Controller reserves the right to unilaterally amend this Policy by providing prior notice to the Data Subject via the Website. Following the entry into force of such modifications, the Data Subject must accept the changes through the method provided on the Website in order to continue using the services.