

Request and Complaint Management Policy

Effective date: 01.01.2019

1. Purpose

The DPC Consulting Kft. (hereinafter referred to as: '**Controller**' or '**Company**') is committed to the fair, efficient and successful management of requests and complaints made by data subjects in relation to our data processing activities while exercising their right of access. The purpose of our request and complaint management system is the following

- we intend to react to submitted requests and complaints in the shortest time possible and in the most cost-effective way,
- we aim to increase the trust of the affected persons towards the procedures with administrative nature and our company, and
- we intend to increase the level of our services and the complaint management mechanism of our employees during our complaint management, through the information we provide.

2. Scope

This regulation applies to those natural persons who record or manage requests and complaints related to data processing submitted under our request and complaint management mechanism, and those who provide help to these requestors or complainers in submitting their complaints.

3. Request

Any request for information on your personal data, and any other request for correction, restriction or erasure is considered as a request, which are detailed below:

a) Right of information

The data subject has the right know which personal data we process related to him or her. The data subject has the right to get confirmation on whether we record or process their personal data and if we do, the data subject has the right to access all their personal data, especially the following:

- purpose of processing the personal data;
- the categories of personal data concerned;
- 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 organisations;
- how long we store the data for;
- where the personal data are not collected from the data subject, any available information as to their source; and
- if we use automated decision-making system during the processing, then the information on that.

b) Right of access

The data subject may ask for information at any time on which personal data are processed by Controller and if said processing is in progress, they have the right to get access to the personal and the following information: purposes of the processing, categories of the processed personal data, third persons to whom the data were disclosed or will be disclosed, term of storage of personal data.

c) Right for rectification

The data subject may request at any time the rectification of their processed personal data if they are inaccurate, or do not reflect reality. The data subject has the right to request from Controller to rectify the inaccurate personal data concerning him or her without any unjustified delay.

d) Right to erasure

The data subject can request the erasure of the data concerning him or her with a statement addressed to Controller. According to the GDPR, the right to erasure also includes the right to be forgotten: the data has to be erased in such way, that they can not be restored. The data subject 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:

- 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 where 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 have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to personal data of persons over the age of 16, in relation to the offer of information society services

e) Right to restriction of processing

The data subject shall have the right to obtain from the Controller restriction of processing. If the data subject disputes the accuracy of personal data, then the restriction refers to only the period that makes it possible for the Controller to check the accuracy of the personal data.

f) Right to data portability

The data subject has further the right to data portability, which means, that the data subject 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 the processing is based on consent.

Moreover, data subject has the right to turn to us with any request or question in relation to our data processing.

4. Complaint

Complaints about any other dissatisfaction with our data management in addition to the requests in section 3, that are related to us, our collaborators or our complaint management mechanism may be considered a complaint in cases where the answer or decision is explicitly or implicitly expected or may be a legal obligation.

We believe that our attitude towards complaints should be positive and solution-oriented, possibly without the need of a court procedure or the procedure of the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter referred to as: 'NAIH') and resolved in a peaceful way within a frame of a cooperation.

5. The method of submitting a request or complaint

You can submit a request or a complaint regarding the conduct, activity or omission of Controller orally (in person: 1138 Budapest, Szekszárdi utca 11. fszt. 1-2, via telephone: +36 30 372-9241) or in written form (personally or with an authorization, through post: 1138 Budapest, Szekszárdi utca 11. fszt. 1-2, via e-mail: office@dpc.hu).

The petition can be submitted by the data subject form free, with reasoning through one of the above-mentioned contact information. The submitted requests will be recorded into the register in every case, will be investigated, a responsible person will be named, the taken measures will be recorded, a deadline will be set out, the controlled data will be defined and at the end, the case will be closed. In case of doubt, Controller may ask for verification of the requestor's identity. If the requestor refuses said verification and the authorization for submitting the request can not be determined beyond doubt, Controller has no obligation to proceed.

The petition and complaint management procedure and the relevant data processing starts based on the freely given consent, but in case of a complaint the Controller has an obligation for data processing, because of nature of the activity.

6. The scope and purpose of the data processed in connection with the request or complaint

6.1. Oral request or complaint and internal request and complaint management

We process the following data with the help of our Internal Complaint Management Sheet in case of an oral or written request or complaint [**Annex 7.1. – Internal Complaint Management Sheet**]. In case of a complaint, in order to resolve it, we always complete the Internal Complaint Management Sheet. This Sheet contains the following data:

	Processed Data	Purpose
1.	Number	Identification
2.	Date of the submission of the request or complaint	Identification
3.	Method of submission: oral (personally/through telephone), written (personally/through post/email)	Identification
4.	Requestor's/Complainer's name	Identification
5.	Telephone	Contact
6.	E-mail	Contact
7.	Description of request / complaint	Investigation of request / complaint
8.	Responsible person for the investigation and appropriate action (name, rank, investigation method, outcome of investigation)	Investigation of request / complaint
9.	Necessary measure, in case of dismissal, its outcome	Investigation of request / complaint
10.	Annexes	Investigation of request / complaint
11.	Name of the responsible person for the execution	Investigation of request / complaint
12.	Date of providing information for the requestor / complainer	Investigation of request / complaint
13.	Date of closing the request / complaint	Investigation of request / complaint

6.2. Written complaint

Complaint can be submitted through the Written Complaint Submission Sheet [**Annex 7.2. – Written Complaint Submission Sheet**]. Please in favour of the most substantial investigation fill the Written Complaint Submission Sheet fully out. Please complete the Written Complaint Sheet entirely for the most thorough

7. Principles of petition and complaint handling

7.1. Efficient answering

Our employees seek to resolve requests and complaints immediately and with the lowest possible formality. We aim to make our services, therefore our request and complaint management process effective so that requestors and complainers or their representatives can have better access to their rights. We handle every incoming petition and complaint in its merits and as far as it is possible, we involve the requestors, complainers and their representatives in their resolution. This Policy provides guidance to our employees, the requestors and the complainers about the main principles and method of our request and complaint management.

7.2. Confidentiality

We protect the identity of the requestors and complainers in all cases. Personal data used for identification of individuals is handled and used by Controller in accordance with data protection legislation, confidentiality provisions, and applicable confidentiality agreements.

7.3. Transparency and fairness

Each and every request and complaint will be handled reasonably, fairly, objectively, impartially. We make sure that the request or complaint of requestor or complainer cannot be handled by a person who may be criticized for conduct or service.

The conflicts of interest, whether they are real or putative, we will handle responsibly. Especially the review of the internal request and complaint management will be handled by a person other than the one who carried out the original decision.

7.4. Free of charge

The first request is free of charge. The second and all additional requests repeatedly filed are HUF 5,000, if the request is related to the same subject or subject matter in the ongoing year, the request is not for information purposes and the Controller legally disregards the rectification, erasure or restriction of the personal data handled on the basis of the repeated application. If a repeated request is justified because the act giving rise to the request has been caused by omission or activity attributable to the Controller, Controller may waive the charges set out.

The submission of a complaint is free of charge.

8. Request and Complaint management process

After drafting and submitting the request or the complaint to the Controller, we will follow the enlisted steps in order to deal with it as effectively as possible:

8.1. First step: submitting

The request or complaint can be submitted orally (personally or via telephone), or in case of a complaint, by completing the Written Complaint Submission Sheet (Annex 7.2.) and forwarding it to us.

8.2. Second step: recording of the request and complaint, information:

We acknowledge the requests and complaints immediately at the time of reception and we introduce it to the relevant register. In case of a written submission, the requestor or complainer is notified within two (2) working days of receipt of the request or complaint. If possible, the requests or complaints will be remedied at the time of the first communication.

We are committed to handling requests and complaints according to the expectations and we inform the requestors and complainers as soon as possible about the followings:

- About our request or complaint management proceeding
- About the number of the request or complaint (case number)
- The expected time of the proceeding
- About the progress of the request and complaint handling and about the reasons for an eventual delay
- About the possible complications in the process and
- About the possible or plausible outcome of the request or complaint.

We advise data subjects as soon as possible if we are unable to take care of any part of their request or complaint and we also advise on where they can turn to with the problem and / or where they can resolve the request or complaint (if relevant). We will also provide information as soon as possible if we are unable to handle the request or complaint within any given deadline or we will be delayed because of other reasons.

8.3. Third step: investigation, information about the outcome of the proceeding:

After we provided information about the recording of the request or complaint, we evaluate it within twenty-five (25) days and inform the data subject about the decision in writing or, if the data subject has submitted the application by electronic means, by electronic means. If the requestor or complainer agrees with the response to the request or the suggestion to resolve the complaint, we will collectively resolve and close the case.

We keep an extensive record of the followings:

- How we resolved the complaint
- What is the outcome of the complaint management (including the merits of the complaint or any other aspect, the possible solutions emerged during the complaint management and the decisions regarding the recommended solutions) and
- Every decision that has to be followed in the future
- We ensure the correct execution, the traceability and the reporting of the outcome of the complaint management to the manager of the Controller.

8.4. Fourth step: closing

As the last step of the process, Responsible person will close all electronic and paper-based documentation generated during the personal data breach, during which Investigator will seal the relevant Excel chart, provides it with a date and stores it in a password-protected location. Paper-based documents are bound and stored in a place inaccessible to others. Document retention time is, due to the occurrence of possible disputes, 10 years or the time of the final closure of the disputes, according to Infotv.

9. Legal remedy

If you furthermore disagree, you can take further steps to the competent court or authority, which is the following:

Nemzeti Adatvédelmi és Információszabadság Hatóság	
Website	http://naih.hu

Mailing address	1530 Budapest, Pf.: 5.
E-mail	ugyfelszolgalat@naih.hu
Telephone	+36(1)391-1400
Online case initiation interface:	https://www.naih.hu/online-uegyinditas.html

Other requests or complaints connected to processing of personal data can be submitted in written form to NAIH. The substantive examination of the request or complaint will be carried out by the authority taking into account the aspects of the particular case. NAIH informs the data subject of the progress and outcome of the application or complaint handling within a reasonable time.

If the request or complaint cannot be solved through the process between the complainer and NAIH, then the complainer can choose to engage in mediation, arbitration or litigation.

10. Duration of processing

Controller processes the record and the copy of the answer for 10 years, starting from their recording based on the relevant and effective Infotv., according to which said processing is obligatory.

11. Method of processing

Data processing is paper-based and carried out manually.

12. Source of data

The Personal data in relation to the complaint management process is collected directly from the affected person, who is informed about the categories of the data collected.

13. Data disclosure

Data collected in connection with the complaint management procedure will be disclosed only in case of a regulatory inspection or relevant proceedings for legal remedy.

Annex 7.1.					
Internal Complaint Management Sheet					
Number:					
Date of complaint:					
Method of submission	Oral			Written	
	Personally	Via telephone	Personally	by post	Email
Name of Complainer:		Telephone:		Email:	
Description of complaint:					
Responsible person for the investigation and appropriate action	Name:			Rank:	
	Investigation method:			Outcome of investigation:	
Evaluation of complaint (grounded, not grounded) and its justification:					
Necessary measure, in case of dismissal its outcome:					
Annexes:					
Responsible person for execution:			Date the complainer is notified:		
Time of closing of the complaint:					

