

**DATA MANAGEMENT INFORMATION  
ON THE RIGHTS OF THE NATURAL PERSON CONCERNED  
CONCERNING THE PROCESSING OF PERSONAL DATA**

*REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (hereinafter referred to as the Regulation) requires that the Controller takes appropriate measures to provide the data subject with all information relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in a clear and plain language, and to facilitate the exercise of the data subject's rights.*

*The obligation of prior information of the data subject is also provided for in Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information. The following information is provided to comply with this legal obligation.*

*The information shall be published on the company's website or sent to the person concerned upon request.*

**Name of the controller**

The publisher of this information is the Data Controller:

Company name: MEDITOP Pharmaceutical Ltd.

Registered office: 1. Ady Endre Street, 2097 Pilisborosjenő, Hungary

Company registration number: 13-09-069459

Tax number: HU12008218

Managing Directors: Dr. Zoltán Ács, Dr. Dávid Greskovits

Phone number: +36 26 336 400

Fax: +36 26 336 041

E-mail address: [info@meditop.hu](mailto:info@meditop.hu)

Website: [www.meditop.hu](http://www.meditop.hu)

Data Protection Officer: Károly Dani

E-mail address: [karoly.dani@meditop.hu](mailto:karoly.dani@meditop.hu)

**(hereinafter referred to as "the Company")**

## **Our Company's IT service provider**

For the maintenance and management of its website, our Company uses a data processor who provides IT services (hosting service) and, within the framework of this service, processes the personal data provided on the website for the duration of our contract with him/her, and the operation performed by him/her is the storage of personal data on the server.

The name of this data processor is as follows:

Company name: Pannon Set Ltd.

Registered office: 165/3. Hrivnák Pál Street, 1237 Budapest, Hungary

Company registration number: 01-09-908052

Tax number: HU14529751

Representative: Károly Lesták

Phone number: +36 1 789 0575

E-mail address: [ps@ps.hu](mailto:ps@ps.hu)

Website: [www.ps.hu](http://www.ps.hu)

## **Visitor data management on the Company's website**

(1) Cookies are short data files placed on the user's computer by the website visited. The purpose of the cookie is to make the given infocommunication and internet service easier and more convenient. There are several types, but they generally fall into two broad categories. One is the temporary cookie, which is placed on the user's device by the website only during a particular session (e.g. during the security identification of an online banking transaction), and the other is the persistent cookie (e.g. a website's language setting), which remains on the computer until the user deletes it. According to the European Commission's guidelines, cookies [unless strictly necessary for the use of the service] can only be placed on the user's device with the user's permission.

(2) In the case of cookies that do not require the user's consent, information should be provided during the first visit to the website. It is not necessary for the full text of the cookie notice to be displayed on the website, but it is sufficient for the website operators to briefly summarise the substance of the notice and to provide a link to the full notice.

(3) In the case of cookies requiring consent, the information may also be linked to the first visit to the website, if the processing of data associated with the use of cookies starts as soon as the page is visited. Where the use of the cookie is linked to the use of a function explicitly requested by the user, the information may also be provided in relation to the use of that function. Even in this case, it is not necessary for the full text of the cookie notice to be displayed on the website, a brief summary of the substance of the notice and a link to the full notice.

## Information on the use of cookies

(1) In line with common Internet practice, our Company also uses cookies on its website. A cookie is a small file containing a series of characters that is placed on a visitor's computer when they visit a website. When you visit that site again, the cookie enables the site to recognize the visitor's browser. Cookies may also store user preferences (e.g. language chosen) and other information. Among other things, they may collect information about the visitor and his or her device, remember the visitor's individual preferences, or be used, for example, when using online shopping carts. In general, cookies facilitate the use of the website, help the website to provide users with a real web experience and 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.

(2) Our Company's website records and processes the following data about the visitor and the device used for browsing when using 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 (language set),
- time of the visit
- the (sub)page, function or service visited.

(3) Acceptance or authorisation of the use of cookies is not mandatory. You can reset your browser settings to reject all cookies or to indicate when a cookie is being sent. While most browsers automatically accept cookies by default, these can usually be changed to prevent automatic acceptance and will offer you the choice each time.

**To find out about the cookie settings of the most popular browsers, click on the links below**

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszni>
- Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>
- Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>
- Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>
- Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>
- Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>
- Safari: <https://support.apple.com/hu-hu/HT201265>

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

(4) The cookies used on this website are not in themselves capable of identifying the user.

(5) Cookies used on the Company's website:

a.) Technically necessary session cookies

These cookies are necessary to enable visitors to browse the website, to use its functions smoothly and fully, to use the services available through the website, including, in particular, to note the actions carried out by the visitor on the pages concerned during a visit. The duration of the processing of these cookies is limited to the current visit of the visitor, and this type of cookie is automatically deleted from his/her computer at the end of the session or when the browser is closed. The data processed are AVChatUserId, JSESSIONID, portal\_referer. The legal basis for this data processing is Article 13/A (3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services. The purpose of the processing is to ensure the proper functioning of the website.

b.) Cookies requiring consent:

These enable the Company to remember the user's choices in relation to the website. The visitor may opt-out of this processing at any time before and during the use of the service. These data cannot be linked to the user's identification data and cannot be transferred to third parties without the user's consent.

b.)/1. Cookies to facilitate use:

The legal basis for processing is the consent of the visitor. The purpose of the processing is to increase the efficiency of the service, to improve the user experience and to make the use of the website more convenient. To improve the user experience, to increase the user experience and to improve the user experience.

b.)/2. Performance cookies:

Google Analytics cookies - you can find out more here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Google AdWords cookies - you can find out more here:

<https://support.google.com/adwords/answer/2407785?hl=hu>

## **Medicinal product side effect reporting on the Company's website**

- (1) On the website, the notifying natural person may give his/her consent to the processing of his/her personal data by accepting the information on data processing.
- (2) The personal data that may be processed are: the name of the notifier, the contact details of the notifier, the patient's initials or medical code, the patient's age or age group, the patient's sex.
- (3) Purpose of the processing of personal data: to comply with the Company's obligation to notify adverse drug reactions.
- (4) The legal basis for the processing is the legal obligation imposed on the Controller (Article 6(1)(c) of the Regulation) and the consent of the data subject.  
The Company processes the personal data of data subjects who make a notification of a reaction to a medicinal product on the contact details of the Company in order to comply with a legal obligation based on the Good Pharmacovigilance Practice issued by the European Medicines Agency. The scope of the data processed is determined by the National Institute of Pharmacy and Food Health on the basis of EMMI (Ministry of Human Resources) Regulation 15/2012 and Article 18 of Act XCV of 2005. These data are: the name of the notifier, the contact details of the notifier, the patient's initials or medical code, the patient's age or age group, the patient's sex.
- (5) Recipients of the personal data: employees of the Company carrying out tasks related to pharmacovigilance reporting.
- (6) Duration of storage of personal data: 10 years after the withdrawal of the product concerned by the pharmacovigilance notification.

## **SUMMARY INFORMATION ON THE RIGHTS OF THE DATA SUBJECT**

### **Right to prior information**

The data subject shall have the right to be informed of the facts and information relating to the processing prior to the start of the processing.  
(Articles 13-14 of the Regulation)

### **Right of access of the data subject**

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, where such processing is taking place, the right to access the personal data and related information as specified in the Regulation.  
(Article 15 of the Regulation).

### **Right to rectification**

The data subject shall have the right to obtain, upon his or her request, the rectification of inaccurate personal data relating to him or her by the controller without undue delay. Taking into account the purposes of the processing, the data subject shall have the right to obtain the rectification of incomplete personal data, including by means of a supplementary declaration.  
(Article 16 of the Regulation).

**Right to erasure ("right to be forgotten")**

The data subject shall have the right to obtain, upon his or her request, the erasure of personal data relating to him or her without undue delay and the controller shall be obliged to erase personal data relating to him or her without undue delay where one of the grounds specified in the Regulation applies.

(Article 17 of the Regulation)

**Right to restriction of processing**

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the controller if the conditions set out in the Regulation are fulfilled.

(Article 18 of the Regulation)

**Obligation to notify the rectification or erasure of personal data or restriction of processing**

The Controller shall inform each recipient to whom or with which the personal data have been disclosed of any rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. Upon request, the Controller shall inform the data subject of these recipients.

(Article 19 of the Regulation)

**Right to data portability**

Subject to the conditions set out in the Regulation, the data subject shall have the right to receive personal data relating to him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which he or she has provided the personal data.

(Article 20 of the Regulation)

**Right to object**

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of Article 6(1)(e) (processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or (f) (processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party) of the Regulation.

(Article 21 of the Regulation)

**Automated decision-making in individual cases, including profiling**

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

(Article 22 of the Regulation)

**Restrictions**

Union or Member State law applicable to a controller or processor may, by means of legislative measures, restrict, in accordance with Articles 12 to 22 and Article 34 and in accordance with the rights and obligations set out in Articles 12 to 22

(Article 23 of the Regulation)

**Informing the data subject of the personal data breach**

Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall inform the data subject of the personal data breach without undue delay.

(Article 34 of the Regulation)

**Right to lodge a complaint with a supervisory authority (right to official redress)**

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes the Regulation.

(Article 77 of the Regulation)

Contact details of the National Authority for Data Protection and Freedom of Information:

9-11. Falk Miksa Street, 1055 Budapest, Hungary

Postal address: 1363 Budapest, P.O. Box 9.

Telephone: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <https://www.naih.hu>

**Right to an effective judicial remedy against the supervisory authority**

Any natural or legal person has the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning him or her, or if the supervisory authority does not deal with the complaint or does not inform the person concerned of the procedural developments concerning the complaint lodged or of the outcome of the complaint within three months.

(Article 78 of the Regulation)

**Right to an effective judicial remedy against the controller or processor**

Every data subject shall have the right to an effective judicial remedy if he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data not in accordance with this Regulation.

(Article 79 of the Regulation)