

FLAVON

FLAVON DECLARATION OF DATA PROCESSING

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| COMPANY NAME: | Flavon International Ltd. |
| HEADQUARTER: | 305 Neasden Lane, London, NW10 1QR |
| REPRESENTATIVE: | László Gaál |
| SERVICES: | Training center, newsletter sending system, website operating system |

1./ The Company as data processor guarantees – with special regard to expertise, reliability and resources – to implement technical and organisational measures which will meet the requirements of GDPR and the applicable national regulations, including for the security of processing.

2./ The company guarantees and ensures that during its data processing activities employees and other people authorised to process the personal data have committed themselves to confidentiality and if the Company is under a statutory obligation of confidentiality, they will seek full compliance with it.

3./ The Company has the appropriate hardware and software tools and it takes responsibility to implement the technical and organizational measures to protect the lawfulness of data processing and the concerned people's right.

4./ The Company declares that its contracting partner as data controller receives all the necessary information that might be necessary to confirm that they are in compliance with the legislations related to the recourse of data processor.

5./ The Company understands that

a) the Data controller is entitled to check the execution conducted by the Company as per contract;

b) it acts pursuant to the written instructions of Data controller exclusively;

c) during its acts it is obliged to make sure that the people authorized to have access to related personal data enter into confidentiality commitments with regard to the personal data accessible by them.

d) taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing; the company is obliged to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

e) it is responsible for taking actions to ensure that any person acting under its authority, who has access to personal data, shall not process those data except on instructions from the controller, unless required to do so by Union or Member State law.

f) it is obliged to make sure that the related data shall be accessible exclusively by authorized people in an internal system or in a direct way and exclusively with the purpose of data process;

g) it is obliged to ensure the regular maintenance and development of the systems and tools in use.

h) it is obliged to physically protect the tool that stores the data in a locked room and to ensure the physical protection of the room;


i) it is obliged to prepare their employees to ensure the compliance with the legal regulations of data protection and standards included in this declaration;

j) more data processors can be involved in the processing of the related data is possible exclusively with the data controller's prior written consent;

k) it is obliged to provide the data controller with all information that might be necessary to confirm the fulfilment of requirements set in Article 28 of GDPR;

l) it shall cooperate in the audit and local inspections if necessary.

Date: 25 May 2018

A handwritten signature in black ink, appearing to read 'László Gaál', is written over a horizontal line.

Flavon International Ltd.

representative: László Gaál director