

**Pincenavigator.hu**

# **Privacy policy**

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## **1. INTRODUCTION**

**Zalakarosi Turisztikai Nonprofit Kft.** (8749 Zalakaros Gyógyfürdő tér 10., tax number: 24273255-2-20) (hereinafter: Service provider, Data manager) subjects themselves to the following rules.

Regulation (EU) No 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 and repealing Regulation (EC) No 95/46 (General Data Protection Regulation) we provide the following information.

This Privacy Policy governs the data management of the following pages:

<https://www.pincenavigator.hu/>

The Privacy Policy is available on the following website:

<https://www.pincenavigator.hu/adatvedelem>

Amendments to the Privacy Policy shall enter into force upon publication at the above website.

### **1.1. THE DATA MANAGER AND THEIR CONTACT INFORMATION**

Name: Zalakarosi Turisztikai Nonprofit Kft.  
Registered office: 8749 Zalakaros Gyógyfürdő tér 10.  
E-mail: [tourinform@zalakaros.hu](mailto:tourinform@zalakaros.hu)  
Telephone: +36 30 335 0597

## 2. DEFINITIONS

1. "*personal data*": means any information relating to an identified or identifiable natural person ("data subject"); identifiable is a natural person who, directly or indirectly, in particular by reference to an identifier, such as name, number, positioning data, online identification or to one or more factors relating to the physical, physiological, genetic, intellectual, economic, cultural or social identity of the natural person can be identified;
2. "*data management*": means any operation or combination of operations carried out on an automated or non-automated basis in relation to the collection of personal data or files, including the collection, recording, filing, sorting, storage, conversion or alteration otherwise made available, coordinated or linked, restricted, deleted or destroyed;
3. "*data manager*": means any natural or legal person, public authority, agency or any 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 data processing are determined by Union or Member State law, the controller or the specific criteria for designating the controller may be defined by Union or Member State law;
4. "*data processor*": means any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the manager;
5. "*recipient*": means any natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not. Public authorities which have access to personal data in the framework of an individual investigation in accordance with Union or Member State law shall not be considered as recipients; the processing of such data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;
6. "*consent of the data subject*" means the voluntary, explicit and unambiguous expression of the will of the data subject, by which the data subject declares, by explicit statement or by an act unambiguously confirming his or her consent, to the processing of personal data concerning him or her;
7. "*data protection incident*" means any breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

### 3. PRINCIPLES FOR THE MANAGEMENT OF PERSONAL DATA

Personal data:

- a) shall be managed in a manner which is lawful and fair and transparent to the data subject ("legality, due process and transparency");
- b) shall be collected for specified, explicit and legitimate purposes and not managed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, for scientific and historical research or for statistical purposes ("purpose limitation") shall not be considered incompatible with the original purpose, in accordance with Article 89 (1);
- c) shall be appropriate and relevant to the purposes for which the data are processed and must be limited to what is necessary ("data-saving");
- d) shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data which are inaccurate for the purposes of the processing are immediately deleted or rectified ("accuracy");
- e) shall be kept in a way which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for a longer period only if they are processed for archiving in the public interest, for scientific and historical research or for statistical purposes in accordance with Article 89 (1), and shall be also subject to the implementation of appropriate technical and organizational measures to protect the rights and freedoms of data subjects ("limited storage");
- f) shall be processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, through the use of appropriate technical or organizational measures ("integrity and confidentiality").

The data manager is responsible for compliance with the above and must be able to justify such compliance ("accountability").

The data manager declares that its data management is carried out in accordance with the principles set out in this section.

## 4. PARTICULAR DATA MANagements

### 4.1. CARD - REGISTRATION

#### 1. Fact of data collection, scope of data processed and **object of data management**:

Personal data	Object of data management	Legal basis
<b>Surname, first name</b>	Authentication, providing secure access to the user account.	Article 6 paragraph (1) point (a) and (b).
<b>E-mail address</b>	Keeping in contact, sending system messages, providing access to the user account.	Article 6 paragraph (1) point (a) and (b).
<b>Password</b>	Providing secure access to the user account.	Article 6 paragraph (1) point (a) and (b).
<b>Country, town, date of birth, gender, language</b>	Statistics, making personalized offers.	Article 6 paragraph (1) point (a) and (b).
<b>Date of registration</b>	Performance of a technical operation	Article 6 paragraph (1) point (a) and (b).
<b>The IP address at registration</b>	Performance of a technical operation	Article 6 paragraph (1) point (a) and (b).

It is not necessary for the email address to contain personal information.

2. **Data Subjects:** All data subjects registered on the Pincenavigator card on the website.
3. **Duration of data processing, deadline for deletion of collected data:** If one of the conditions set out in Article 17 (1) of the GDPR is met, it shall be up to the data subject's request for deletion. Deleting your registration will immediately clear your personal information. Pursuant to Article 19 of the GDPR, the controller shall inform the data subject by electronic means of the deletion of any personal data provided by the data subject. If the deletion request of the data subject extends to the e-mail address provided by the data subject, the controller will also delete the e-mail address upon notification.
4. **Identity of potential data managers entitled to access the data, recipients of personal data:** Personal data may be handled by authorized data manager staff as set out in this statement.
5. **Description of data subjects' rights in connection with data processing:**
  - The data subject may request from the controller access to, rectification, deletion or restriction of processing of personal data concerning them, and
  - the data subject has the right to data portability and to withdraw the consent at any time.

6. **The Data Subject may initiate access, deletion, modification or limitation of the processing of personal data and the portability of personal data in the following ways:**
  - via post to the 8749 Zalakaros Gyógyfürdő tér 10. address
  - via e-mail to the [tourinform@zalakaros.hu](mailto:tourinform@zalakaros.hu) e-mail address,
  - via telephone at the +36 30 335 0597 number.
7. **Legal basis of data management:** Article 6 paragraph (1) point (a) and (b).
8. We inform you, that
  - data management **is based on your consent, and is necessary to take action at your request prior to the conclusion of the contract.**
  - personal information **must be** provided in order to register
  - failure to provide data **results in** the inability to create the user account.

## 4.2. CONTACT

### 1. Fact of data collection, scope of data processed and **object of data management**:

Personal data	Object of data management	Legal basis
Name	Identification	Article 6 paragraph (1) point (a),(b) and (c).
E-mail address	Communication, replying to messages	Article 6 paragraph (1) point (a),(b) and (c).
Telephone number	Communication	Article 6 paragraph (1) point (a),(b) and (c).
Content of the message	Necessary for replying to messages	Article 6 paragraph (1) point (a),(b) and (c).
Date of contact	Performance of a technical operation	Article 6 paragraph (1) point (a),(b) and (c).
The IP address used when getting in contact	Performance of a technical operation	Article 6 paragraph (1) point (a),(b) and (c).

It is not necessary for the email address to contain personal information.

2. **Data Subjects:** All the data subjects who send a message through the contact form.
3. **Duration of data processing, deadline for deletion of collected data:** If any of the conditions of Article 17 (1) of the GDPR are met, it shall continue until the subject applies for deletion.
4. **Identity of potential data managers entitled to access the data, recipients of personal data** Personal data may be handled by authorized staff of the data manager.
5. **Description of data subjects' rights in connection with data processing**
  - The data subject may request from the controller access to, rectification, deletion or restriction of processing of personal data concerning them, and
  - the data subject has the right to data portability and to withdraw the consent at any time.
6. **The Data Subject may initiate access, deletion, modification or limitation of the processing of personal data and the portability of personal data in the following ways:**



- via post to the 8749 Zalakaros Gyógyfürdő tér 10. address
- via e-mail to the [tourinform@zalakaros.hu](mailto:tourinform@zalakaros.hu) e-mail address,
- via telephone at the +36 30 335 0597 number.

7. **Legal basis of data management:** the consent of the data subject, Article 6 (1) (a), (b) and (c). By contacting us, you consent to the handling of your personal information (name, telephone number, email address) received by us when you contact us in accordance with these policies.

8. We inform you, that

- **this data management is based on your consent** or, in the case of a contractual relationship, a **legal obligation** (cooperation).
- it is **required** to provide your personal information in order to contact us.
- failure to provide data **will result in** you being unable to contact the Service Provider.
- the withdrawal of consent shall not affect the lawfulness of the consent based data management prior to the withdrawal.

### 4.3. CUSTOMER COMMUNICATION

1. Fact of data collection, scope of data processed and object of data management:

Personal data	Object of data management	Legal basis
Name, e-mail address, telephone number.	Communication, identification, fulfilment of contracts, business purposes.	Article 6 (1) (b) and (c), Article 6:21 of Act V of 2013 on the Civil Code in the case of the enforcement of claims arising from a contract

2. **Data Subjects:** Anyone involved in contacting the Data Manager via phone / email / in person or in a contractual relationship.
3. **Duration of data processing, deadline for deletion of collected data:** Letters containing requests are stored until the request for deletion of the data subject, or up to 2 years.
4. **Identity of potential data managers entitled to access the data, recipients of personal data** Personal data may be handled by authorized staff of the data manager, according to the above principles.
5. **Description of data subjects' rights in connection with data processing**
- The data subject may request from the controller access to, rectification, deletion or restriction of processing of personal data concerning them, and
  - the data subject has the right to data portability and to withdraw the consent at any time.
6. **A The Data Subject may initiate access, deletion, modification or limitation of the processing of personal data and the portability of personal data in the following ways:**
- via post to the 8749 Zalakaros Gyógyfürdő tér 10. address
  - via e-mail to the [tourinform@zalakaros.hu](mailto:tourinform@zalakaros.hu) e-mail address,
  - via telephone at the +36 30 335 0597 number.

7. **Legal basis of data management:**

8. We inform you, that

- **Data management is necessary for the performance of the contract and for the submission of an offer.**
- it is **required** provide personal information in order to fulfil the contract / other requests.
- Failure to provide the data will **result in** us being unable to complete the contract / process your request.

#### 4.4. NEWSLETTER, DM ACTIVITY

1. Pursuant to Section 6 of Act XLVIII of 2008 on the General Conditions and Certain Limits of Economic Advertising Activities, the User may give prior and express consent to contacting the Service Provider with his promotional offers and other mailings at the contact details provided at registration.
2. In addition, Customer, subject to the provisions of this Provision, may consent to the Service Provider handling personal data necessary for sending promotional offers.
3. The Service Provider shall not send unsolicited advertising messages and the User may, without limitation and without justification, unsubscribe from sending offers. In this case, the Service Provider will delete all personal data necessary for sending advertising messages from its register and will not contact the User with further advertising offers. User can unsubscribe from ads by clicking on the link in the message.
4. Fact of data collection, scope of data processed and **object of data management**:

Personal data	Object of data management	Legal basis
Name, e-mail address.	Authentication, making subscription possible to newsletter / coupons.	Consent of the data subject, Article 6 (1) (a)
Date of subscription	Performance of a technical operation	Section 6 (5) of Act XLVIII of 2008 on the General Conditions and Certain Limits of Economic Advertising Activities.
IP address used at the time of subscription	Performance of a technical operation	

5. **Data Subjects:** All data subjects subscribed to the newsletter.
6. **Object of data management:** sending electronic messages containing advertising (e-mail, text messages, push notifications) to the data subject, providing information on current information, promotions, new features, etc.
7. **Duration of data processing, deadline for deletion of collected data:** data management shall last until the declaration of consent is withdrawn, or the subjects unsubscribes.
8. **Identity of potential data managers entitled to access the data, recipients of personal data** Personal data may be managed by the sales and marketing staff of the data manager, according to the above principles.
9. **Description of data subjects' rights in connection with data processing**

- The data subject may request from the controller access to, rectification, deletion or restriction of processing of personal data concerning them, and
- can object to the processing of their personal data; and
- the data subject has the right to data portability and to withdraw the consent at any time.

**10. The Data Subject may initiate access, deletion, modification or limitation of the processing of personal data and the portability of personal data in the following ways**

- via post to the 8749 Zalakaros Gyógyfürdő tér 10. address
- via e-mail to the [tourinform@zalakaros.hu](mailto:tourinform@zalakaros.hu) e-mail address,
- via telephone at the +36 30 335 0597 number.

11. The data subject can unsubscribe from the newsletter at any time, free of charge.

12. We inform you, that

- **data management is based on your consent and the legitimate interest of the service provider.**
- it is **required** to provide your personal information in order to receive our newsletter.
- failure to provide information will **result in** us being unable to send you a newsletter.
- please be advised that you can withdraw your consent at any time by clicking unsubscribe.
- the withdrawal of consent shall not affect the lawfulness of the consent based data management prior to the withdrawal.

## 5. RECIPIENTS TO WHICH PERSONAL DATA SHALL BE COMMUNICATED

"recipient": means any natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not.

### 5.1. DATA PROCESSORS (WHO MANAGES DATA IN THE NAME OF THE DATA MANAGER)

The Data Manager shall use data processors to facilitate its own data management activities and to fulfil its contractual or legal obligations.

The Data Manager places great emphasis on using only data processors who provide adequate guarantees to implement appropriate technical and organizational measures to ensure compliance with the data processing requirements of the GDPR and to protect the rights of data subjects.

The Data Manager and any personnel acting under the control of the Data Manager or the Data Processor who has access to the personal data shall process the personal data contained in these Principles only in accordance with the instructions of the data manager.

The data manager is legally responsible for the data processing activities. The Data Processor shall only be liable for damages caused by the Data Processor in the event that they have failed to comply with the obligations specifically set forth in the GDPR specifically for the Processors or if the lawful instructions of the Data Manager have been disregarded or acted upon.

The data processor shall not make any decision regarding the management of the data.

DATA PROCESSING ACTIVITIES	NAME	ADDRESS, CONTACT
<b>Hosting Service Provider</b>	RACKFOREST KFT.	Address: 1132 Budapest, Victor Hugo u. 18-22. Tax number: 14671858-2-41
<b>Sending Newsletters</b>	Morgens Design Kft.	8800 Nagykanizsa, Csányi László utca 2. sales@morgens.hu
<b>Administration, operation</b>	Zalakarosi Turisztikai Egyesület	8749 Zalakaros Gyógyfürdő tér 10. tel: +36 93 340 421 email: <a href="mailto:tourinform@zalakaros.hu">tourinform@zalakaros.hu</a>
	Zalakarosi Turisztikai Nonprofit Kft.	8749 Zalakaros Gyógyfürdő tér 10. tel: +36 93 340 421 email: <a href="mailto:tourinform@zalakaros.hu">tourinform@zalakaros.hu</a>

<b>Development</b>	Qilaq Solutions Kft.	8623 Balatonföldvár, Móricz Zsigmond utca 26. B ép. E-mail: info@qilaq.hu Telephone: +36 20 964 2839
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## 6. MANAGEMENT OF COOKIE(S)

1. Fact of data collection, scope of data processed: Unique ID number, dates, times
2. Data Subjects: All data subjects visiting the website.
3. Object of data processing: Identifying users and tracking visitors.
4. Duration of data processing, deadline for deletion of collected data:

Type of Cookie	Legal basis of data processing	Duration of data processing	Scope of processed data
Session cookies	Article 13 / A (3) of Act CVIII of 2001 on electronic commerce services and certain aspects of information society services (Electronic Commerce Act)	The time period until the end of the relevant visitor session	connect.sid
Permanent or saved cookies	Article 13 / A (3) of Act CVIII of 2001 on electronic commerce services and certain aspects of information society services (Electronic Commerce Act)	the deletion of the data subject	
Statistical cookies	Article 13 / A (3) of Act CVIII of 2001 on electronic commerce services and certain aspects of information society services (Electronic Commerce Act)	1-2 months	

5. Identity of potential data managers entitled to access the data, recipients of personal data: By using cookies, the manager does not manage personal data.
6. Description of data subjects' rights in connection with data processing: The data subject has the option to delete cookies in the browsers' Tools / Preferences menu, usually under the Privacy section.
7. Legal basis of data processing: The consent of the data subject is not required if the sole purpose of the use of cookies is to transmit communications over an electronic communications network or to provide an information society service explicitly requested by the subscriber or user.
8. A Most browsers that our users use allow you to set which cookies should be saved and allow (specific) cookies to be deleted again. If you restrict the saving of a cookie on certain web pages or if you do not allow third-party cookies, this may in certain



circumstances mean that our website may no longer be fully usable. Here's how to customize your cookie settings for standard browsers:

**Google Chrome** (<https://support.google.com/chrome/answer/95647?hl=hu>)

**Internet Explorer** (<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>)

**Firefox** (<https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>)

**Safari** ([https://support.apple.com/kb/PH21411?locale=hu\\_HU](https://support.apple.com/kb/PH21411?locale=hu_HU))

## **7. USING GOOGLE AND FACEBOOK SERVICES**

### **7.1. USING GOOGLE ADS CONVERSION TRACKING**

1. The controller uses the online advertising program "Google Ads" and uses Google's conversion tracking service. Google Conversion Tracking is an analytics service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; „Google “).
2. When the User accesses a web page through a Google ad, a conversion tracking cookie is placed on your computer. These cookies are limited in their validity and do not contain any personal information and cannot be identified by the User.
3. When the User browses certain pages of the Website and the cookie has not expired, Google and the Data Controller may also see that the User has clicked on the advertisement.
4. Each Google Ads client receives a different cookie, so they cannot be tracked through the Ads client websites.
5. The information obtained through conversion tracking cookies serves the purpose of generating conversion statistics for the customers who opt in to conversion tracking for Ads. This is how customers are informed about the number of users who click on their ad and are sent to a page with a conversion tracking tag. However, they do not have access to information that would identify any user.
6. If you do not want to participate in conversion tracking, you can opt out by disabling cookies on your browser. After that, you won't be included in the conversion tracking statistics.
7. More information and the Google Privacy Policy can be found at: [www.google.de/policies/privacy/](http://www.google.de/policies/privacy/)

### **7.2. USING GOOGLE ANALYTICS**

1. This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are stored on your computer, to help analyse the use of a web page that a User visits.
2. The information generated by the cookies associated with the User's use of the Site is typically transferred and stored on a Google server in the US. By activating the IP anonymization on the website, Google will shorten the User's IP address within the Member States of the European Union or other States party to the European Economic Area Agreement.

3. The full IP address will be transmitted to and shortened to Google's server in the US only in exceptional cases. Google will use this information on behalf of the operator of this web site to evaluate how the user has used the web site, to report web site activity to the web site operator, and to provide additional services related to the use of the web site and the Internet.
4. Within Google Analytics, the IP address transmitted by the User's browser is not reconciled with other Google data. The User may prevent the storage of cookies by properly configuring his / her browser, however, please note that in this case, not all features of this website may be fully utilized. You may also prevent Google from collecting and processing your cookie-related information about your use of the Website (including your IP address) by downloading and installing the browser plug-in available at the following link. <https://tools.google.com/dlpage/gaoptout?hl=hu>

### 7.3. SOCIAL NETWORKING SITES

1. The fact of collecting the data, the scope of the managed data: Facebook / Twitter / Pinterest / YouTube / Instagram etc. registered username and public profile picture.
2. Data Subjects: Anyone who has registered on Facebook / Twitter / Pinterest / YouTube / Instagram etc. social networking sites and "liking" the Service Provider's social networking site or contacting the data controller through the social networking site.
3. Object of Data Collection: To share or "like", follow, or promote the content, products, promotions or the website itself on social networking sites.
4. Duration of the data processing, time limit for deletion of data, identity of potential controllers who are entitled to know the data and description of data subjects' data processing rights Data management is done on social networking sites, so the duration, method of data management, and the options for deleting and modifying data are governed by the specific social networking site.
5. Legal basis for processing the data: Voluntary consent of the data subject to the processing of their personal data on social networking sites.

## **8. CUSTOMER RELATIONS AND OTHER DATA MANAGEMENT**

1. In case you have any questions or problems in connection with our data management services, you may contact the data manager in the ways specified on the website (telephone, e-mail, social networking sites, etc.).
2. The Data Manager deletes incoming emails, messages, phone logs, Facebook messages, etc. along with the name and email address of the person concerned and any other personally identifiable personal data within a maximum of 2 years from the date of disclosure.
3. Data handling not listed in this privacy policy will be communicated when the data is collected.
4. The Service Provider is obliged to provide information, provide information, provide data and provide documents upon exceptional request of the authorities or upon request of other authorities on the basis of legal authority.
5. In these cases, the Service Provider will provide the requester with personal data only to the extent and to the extent necessary to achieve the purpose of the request, provided that the exact purpose and scope of the data have been indicated.

## **9. RIGHTS OF DATA SUBJECTS**

### **1. Right of access**

You have the right to receive feedback from the controller as to whether your personal data is being processed and, if so, to have access to the personal data and information listed in the Regulation.

### **2. Right of rectification**

You have the right, upon request, to rectify any inaccurate personal information concerning you without undue delay. Given the purpose of your data processing, you have the right to request that any personal information that is incomplete be completed, including in a way of a supplementary statement.

### **3. Right of erasure**

You have the right to request the erasure of personal data relating to you without undue delay and the data controller is obliged to delete personal data relating to you without undue delay under certain conditions.

### **4. Right to be forgotten**

If the Data Manager discloses personal data and is required to delete it, it shall take reasonable steps, including technical measures, taking into account the technology available and the cost of implementation, to inform the Data Managers that you have requested the erasure of links to the personal data in question or the deletion of a copy or duplicate of such personal data.

### **5. Right to restrict data management**

You have the right, at your request, to restrict the data management if any of the following conditions are met:

- You dispute the accuracy of your personal information, in which case the limitation applies to the period of time that allows the controller to verify the accuracy of your personal information;
- the data processing is unlawful and you object to the deletion of the data and instead request that their use be restricted;
- the controller no longer needs personal data for the purposes of data processing, but you request it for the purpose of making, enforcing or defending legal claims;
- You have objected to the data management; in this case, the limitation applies to the period until it is determined whether the controller's legitimate reasons take precedence over your legitimate reasons.

### **6. The right to data portability**

You have the right to receive personal data about you made available to a data controller in a structured, widely used, machine-readable format, and to transmit such data to

another data controller without being hindered by the data manager to whom you provided personal information (...)

## 7. Right to object

In case of data processing based on a legitimate interest or a power of attorney as a legal authority, you have the right to object at any time to the processing of your personal data, including profiling based on those provisions, for reasons related to your situation.

## 8. Right to object against direct sales

In case your personal data is being processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for this purpose, including profiling, if it is related to direct marketing. If you object to the processing of personal data for the purpose of direct marketing, personal data may no longer be processed for this purpose.

## Automated decision making on individual matters, including profiling

You have the right not to be subject to any decision based solely on automated data management, including profiling, that would have legal effect or be substantially affected by it.

The above paragraph shall not apply if the decision:

- is necessary for the conclusion or performance of a contract between you and the data manager;
- it is made possible by a European Union or Member State law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- It is based on your explicit consent.

## 10. DEADLINE FOR ACTION

The data manager shall inform you without undue delay, but by all means **within one month** of receipt of the request, of the action taken on these requests.

It **may be extended by 2 months** if necessary. The data manager shall inform you of the extension of the deadline, indicating the reasons for the delay, **within one month** of receipt of the request.

In case the data manager does not act on your request, it shall inform you **without delay, but no later than one month after the receipt of the request, of the reasons for the absence of action** and of the fact that you are able to file a complaint with a supervisory authority.

## 11. SECURITY OF DATA MANAGEMENT

The Data Manager and the Data Processor shall take appropriate technical and organizational measures, taking into account the state of science and technology and the costs of its implementation, as well as the nature, scope, circumstances and purposes of

the processing and the varying likelihood and severity of the rights and freedoms of natural persons to ensure a level of data security appropriate to the degree of risk, including, where appropriate, by:

- a) pseudonymisation and encryption of personal data;
  - b) ensuring the continued confidentiality, integrity, availability and resilience of systems and services used to process personal data;
  - c) in the event of a physical or technical incident, the ability to restore access to, and availability of, personal data in a timely manner;
  - d) a procedure for periodically testing, evaluating and examining the effectiveness of technical and organizational measures taken to ensure security of data processing.
  - e) The data processed must be stored in such a way that they cannot be accessed by unauthorized persons. In the case of paper-based media, the establishment of a physical storage and filing system, and in the case of electronic data, a central authorization system.
  - f) The way in which data is stored by IT shall be chosen such that it can be erased, taking into account the possible different deletion deadlines, at the end of the deletion deadline or if otherwise necessary. The deletion must be irreversible.
  - g) Paper-based media must be deprived of personal information with the help of a shredder or an external, specialized shredder. In the case of electronic media, physical destruction of the electronic media and, where necessary, prior deletion of the data in a secure and irreversible manner shall be ensured.
- a) The Data Manager shall apply the following specific data security measures:
- a. To ensure the security of personal data processed on paper, the Service Provider shall apply the following measures (*physical protection*):
    - i. Documents should be stored in a secure, lockable, dry room.
    - ii. The building and premises of the Service Provider are equipped with fire protection and property protection equipment.
    - iii. Personal data may only be accessed by authorized persons and may not be accessed by third parties.
    - iv. The Employee authorized for data processing of the Service Provider may only leave the premises where data management takes place by locking the data media entrusted to them or by closing the room in question.
    - v. Where paper-based personal data is digitized, the rules governing digitally stored documents shall apply.

b. *IT protection*

- i. The computers and mobile devices (other data carriers) used for data management are the property of the Service Provider.
- ii. Data on computers can only be accessed with a username and password.
- iii. The central server machine can only be accessed by duly authorized persons.
- iv. The Service Provider uses data backups and archives to ensure the security of digitally stored data.
- v. The computer system containing personal data used by the Service Provider shall be virus-protected.

## **12. INFORMATION OF DATA SUBJECTS ABOUT A DATA PROTECTION INCIDENT**

In case the data protection incident is likely to present a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject without undue delay of the data protection incident.

The information provided to the data subject shall **clearly and comprehensibly** state the nature of the data protection incident and the name and contact details of the data protection officer or other contact person providing further information; a description of the likely consequences of a privacy incident; a description of the measures taken or planned by the controller to remedy the privacy incident, including, where appropriate, measures to mitigate any adverse consequences that may result from the privacy incident.

It is not necessary to inform the data subject if any of the following conditions are met:

- the Data Manager has **applied appropriate technical and organizational security measures** to the data affected by the data protection incident, in particular measures such as the use of encryption, **which leaves the data unintelligible** to unauthorized persons;
- the Data Manager has taken further measures following the data protection incident to **ensure that the high risk to the data subject's rights and freedoms is no longer likely to materialize**;
- information would **require a disproportionate effort**. In such cases, the data subjects shall be informed through publicly available information or similar measures shall be taken to ensure that the data subjects are provided with equally effective information.

If the Data Manager has not already informed the data subject about the data protection incident, the supervisory authority, after considering whether the data protection incident is likely to present a high risk, may order the data subject to be informed.

## **13. NOTIFICATION OF THE AUTHORITY ABOUT A PRIVACY INCIDENT**

The data manager shall notify the competent supervisory authority about a data protection incident according to Article 55 without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is unlikely to endanger the rights and freedoms of data subjects. If



the notification is not made within 72 hours, the reasons for the delay shall also be provided.

#### **14. REVIEW OF THE MANDATORY DATA MANAGEMENT**

Unless specified by law, local government decree or mandatory European Union law, the duration or periodic review of mandatory data processing **shall be reviewed by the data manager at least every three years from the start of the data management**, to assess whether the processing of personal data by them or by any processor acting on their behalf is **necessary** to achieve the purpose of the processing.

The circumstances and results of this review **shall be documented** by the Data Manager **and the documentation shall be retained for a period of ten years following the completion of the review** and shall be made available to the National Data Protection and Freedom of Information Authority upon request (Authority).

#### **15. FILING A COMPLAINT**

Complaints about possible violations of the data controller can be made to the National Data Protection and Freedom of Information Authority:

**National Data Protection and Freedom of Information Authority**

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Mailbox: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

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

## 16. CLOSING REMARKS

During the preparation of this Privacy Policy we have observed the following legal provisions:

- On the protection of natural persons with regard to the processing of personal data and on the free flow of such data and repealing Regulation (EC) No. 95/46 (General Data Protection Regulation) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (GDPR) (April 27, 2016)
- Act CXII of 2011 on the Right of Information Self-Determination and Freedom of Information (hereinafter referred to as "Information Act")
- Act CVIII of 2001 on Certain Issues in Electronic Commerce Services and Information Society Services (mainly § 13 / A)
- Act XLVII of 2008 - Prohibiting Unfair Commercial Practices against Consumers;
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Economic Advertising (in particular Article 6)
- Act XC of 2005 on Freedom of Electronic Information
- Act C of 2003 on Electronic Communications (specifically §155)
- No. 16/2011 Opinion on EASA / IAB Recommendation on Good Practice for Online Behavioural Advertising
- Recommendation of the National Authority for Data Protection and Freedom of Information on the Data Privacy Requirements of Prior Information