

ZATOGE Privacy Policy

Kriil Team Kft

Privacy policy

## Introduction

Kriil Team Kft (1172 Budapest, Aranykút utca 76. Hungary. tax number: 23525690-2-42, company registration number / registration number: 01-09-969703) (hereinafter: Service Provider, data controller) submits to the following regulations:

On the protection of individuals 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) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 2016 27.) we provide the following information.

This Privacy Policy governs the data management of the following sites / mobile applications:

<https://zatoge.com>

The privacy policy is available at: [https://zatoge.com/data\\_protection\\_declaration](https://zatoge.com/data_protection_declaration)

Amendments to the Regulations shall enter into force upon publication at the above address.

## Data controller and contact details:

Name: Kriil Team Kft

Headquarters: 1172 Budapest, Aranykút utca 76. Hungary

Email: [info@zatoge.com](mailto:info@zatoge.com)

Phone: 00491323297937

## Concept definitions

1. "personal data" shall mean any information relating to an identified or identifiable natural person ("data subject"); identify a natural person who, directly or indirectly, in particular on the basis of an identifier such as name, number, location, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;
2. "processing" means any operation or set of operations on personal data or files, whether automated or non-automated, such as collection, recording, systematization, sorting, storage, transformation or alteration, retrieval, consultation, use, communication, transmission or dissemination; by other means of access, coordination or interconnection, restriction, deletion or destruction;
3. "controller" means the 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 the processing are determined by Union or Member State law, the

controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;

4. "processor" means any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

5. "recipient" means a natural or legal person, public authority, agency or any other body to whom personal data are communicated, whether a third party or not. Public authorities that may have access to personal data in the context 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. "data subject's consent" means the voluntary, specific and duly informed and unambiguous statement of the data subject's intention, by means of a statement or unequivocal statement of consent, to consent to the processing of personal data concerning him or her;

7. "data protection incident" means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data which have been transmitted, stored or otherwise handled.

## **Principles for the processing of personal data**

Personal information:

1. be processed lawfully and fairly and in a manner that is transparent to the data subject ("legality, due process and transparency");

2. be collected only for specified, explicit and legitimate purposes and not be treated in a way incompatible with those purposes; further processing for data purposes for archiving in the public interest, for scientific and historical research purposes or for statistical purposes ("purpose limitation") shall not be considered incompatible with the original purpose in accordance with Article 89 (1);

3. they must be appropriate, relevant and limited to what is necessary for the purposes of the processing ("data saving");

4. be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which is inaccurate for the purposes of the processing are erased or rectified without delay ("accuracy");

5. it must be stored in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for a longer period only if the processing of personal data is carried out in accordance with Article 89 (1) for archiving in the public interest, for scientific and historical research purposes or for statistical purposes, in accordance with this Regulation; subject to the implementation of appropriate technical and organizational measures to protect its freedoms ("storage limitation");

6. processing must be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage to personal data ("integrity and confidentiality"), using appropriate technical or organizational measures.

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability").

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

# Registration (creating a user account)

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

Personal data	Purpose of data management	Legal basis
Username	Authentication, for secure access to the user account.	Article 6 (1) (a) and (b).
E-mail address	Stay in touch, send system messages, log in to a user account	Article 6 (1) (a) and (b).
Password	Provides secure access to the user account.	Article 6 (1) (a) and (b).
Date of registration	Perform a technical operation.	Article 6 (1) (a) and (b).
The IP address at the time of registration	Perform a technical operation.	Article 6 (1) (a) and (b).

Email address does not need to contain personal information.

2. Stakeholders: all stakeholders registered on the website / mobile application.

3. Duration of data processing, deadline for erasure of data: If one of the conditions set out in Article 17 (1) of the GDPR is met, it lasts until the data subject requests the erasure. Deleting the registration will immediately delete the personal data. The controller shall inform the data subject electronically pursuant to Article 19 of the GDPR of the deletion of any personal data provided by the data subject. If the data subject's request for cancellation includes the e-mail address provided by the data subject, the data controller will also delete the e-mail address after the notification.

4. Persons of potential data controllers entitled to access the data, recipients of personal data: Personal data may be processed by the authorized employees of the data controller on the basis of the contents of this prospectus.

5. Description of data subjects' rights in relation to data processing: The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and the data subject has the right to data portability and to withdraw his or her consent at any time.

6. Access to, deletion, modification or restriction of the processing of personal data and the portability of data may be initiated by the data subject in the following ways:

- by post at 1172 Budapest, Aranykút utca 76. Hungary
- by e-mail to [info@zatoge.com](mailto:info@zatoge.com)
- by phone at 00491323297937.

7. Legal basis for data processing: Article 6 (1) (a) and (b).

8. Please be informed that

- the data processing is necessary to take steps at your request with your consent or before concluding the contract.
- is required to provide personal information so that we can register.
- failure to provide data will result in the inability to create the user account.

# Contact

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

Personal data	Purpose of data management	Legal basis
Name	Identification	Article 6 (1) (a) and (b)
E-mail address	Stay in touch, send reply messages	Article 6 (1) (a) and (b)
Phone number	Keeping in touch	Article 6 (1) (a) and (b)
Message content	Required to respond	Article 6 (1) (a) and (b)
Date of contact	Perform a technical operation.	Article 6 (1) (a) and (b)
The IP address at the time of registration.	Perform a technical operation.	Article 6 (1) (a) and (b)

Email address does not need to contain personal information.

2. Stakeholders: All stakeholders who send a message through the contact form.

3. Duration of data processing, deadline for erasure of data: If one of the conditions set out in Article 17 (1) of the GDPR is met, it lasts until the data subject's request for erasure.

4. The identity of the potential data controllers entitled to access the data, the recipients of the personal data: The personal data may be processed by the authorized employees of the data controller.

5. Description of data subjects' rights in relation to data processing: The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and the data subject has the right to data portability and to withdraw his or her consent at any time.

6. Access to, deletion, modification or restriction of the processing of personal data and the portability of data may be initiated by the data subject in the following ways:

- by post at the address 1172 Budapest, Aranykút utca 76. Hungary
- by e-mail to [info@zatoge.com](mailto:info@zatoge.com),
- by phone at 00491323297937.

7. Legal basis for data processing: data subject's consent, Article 6 (1) (a) and (b). If you contact us, you consent to the processing of your personal data (name, telephone number, e-mail address) provided to us during the contact in accordance with these policies.

8. Please be informed that this data management is based on your consent or is necessary for making an offer. you are required to provide personal information so that you can contact us. failure to provide data has the consequence of not being able to contact the data controller. the withdrawal of consent shall not affect the lawfulness of the consent-based data processing prior to the withdrawal.

## Newsletter, DM activity

1. Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activity. Pursuant to Section 6 of the Act, the User may consent in advance and expressly to contact the Service Provider with his advertising offers and other items at the contact details provided during registration.
2. Furthermore, keeping in mind the provisions of this prospectus, the Customer may consent to the Service Provider handling the personal data necessary for sending advertising offers.
3. The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from sending offers free of charge without restriction or justification. In this case, the Service Provider deletes all personal data - necessary for sending advertising messages - from its register and does not contact the User with its further advertising offers. The user can unsubscribe from the ads by clicking on the link in the message.
4. Fact of data collection, scope of data processed and purpose of data management:

Personal data	Purpose of data management	Legal basis
Name, E-mail address	Identification	The consent of the data subject
Date of registration	Perform a technical operation.	Article 6 (1) (a).
The IP address at the time of registration	Perform a technical operation.	Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activity. Section 6 (5) of the Act.

5. Stakeholders: All stakeholders who subscribe to the newsletter.
6. The purpose of data management: sending electronic messages containing advertising (e-mail, sms, push message) to the data subject, providing information on current information, products, promotions, new features, etc.
7. Duration of the data processing, deadline for deleting the data: the data processing lasts until the withdrawal of the consent statement, ie until the unsubscription.
8. Identity of potential data controllers entitled to access the data, recipients of personal data: Personal data may be processed by the data controller and its sales and marketing staff, in compliance with the above principles.
9. Description of data subjects' rights in relation to data processing: The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and may object to the processing of your personal data and the data subject has the right to data portability and to withdraw his or her consent at any time.
10. Access to, deletion, modification or restriction of the processing of personal data, portability of data or protest may be initiated by the data subject in the following ways:
  - by post at the address 1172 Budapest, Aranykút utca 76. Hungary
  - by e-mail to [info@zatoge.com](mailto:info@zatoge.com),
  - by phone at 00491323297937.
11. The data subject may unsubscribe from the newsletter free of charge at any time.
12. Please be informed that

- data management is based on your consent and the legitimate interest of the service provider.
- you are required to provide personal information if you wish to receive a newsletter from us.
- failure to provide this will result in us not being able to send you a newsletter.
- we inform you that you can withdraw your consent at any time by clicking on unsubscribe.
- the withdrawal of consent shall not affect the lawfulness of the consent-based data processing prior to the withdrawal.

## B2B Customer Relationship Management

At this point, the data controller regulates the processing of contact data of natural persons (stakeholders) acting on behalf of its business partners and other clients.

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

Personal data	Purpose of data management	Legal basis
Name, e-mail address, telephone number, other contact details in the contract.	Contact, cooperation, conclusion of a contract, fulfillment of rights and obligations arising from the contract.	In the case of legal persons: Article 6 (1) (f) (legitimate interest of the controller)  In the case of self-employed persons, Article 6 (1) (b).

2. Source of data:

- In the case of a legal entity: the personal data of the data subject are provided by the business partner of the data controller.
- In the case of sole proprietors and individuals: directly from the data subject.

3. Stakeholders: All stakeholders in a contractual relationship with the controller and natural persons acting on behalf of the controller's business partners.

4. Duration of data management, deadline for deletion of data: Data management until the termination of the legal relationship between the data controller and the business partner or, in the case of claims, until the statute of limitations.

5. The identity of the potential data controllers entitled to access the data, the recipients of the personal data: The personal data may be processed by the authorized employees of the data controller, respecting the above principles.

6. Description of data subjects' rights in relation to data processing:

- The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her
- The data subject has a right to data portability
- Natural persons acting on behalf of legal persons may object to the processing.

7. Access to, deletion, modification or restriction of the processing of personal data and the portability of data may be initiated by the data subject in the following ways:

- by post at the address 1172 Budapest, Aranykút utca 76. Hungary
- by e-mail to [info@zatoge.com](mailto:info@zatoge.com),
- by phone at 00491323297937.

## 8. Legal basis for data processing:

- In the case of natural persons acting on behalf of legal persons, Article 6 (1) (f) of the GDPR. Name of legitimate interest: cooperation, performance of contract, business purpose.
- For self-employed persons and natural persons: Article 6 (1) (b) of the GDPR.
- In the case of enforcement of claims arising from the contract, Act V of 2013 on the Civil Code 6:21. § 5 years.

## 6:22. § [Limitation period]

- (1) Unless otherwise provided by this Act, claims shall lapse within five years.
- (2) The limitation period shall begin when the claim becomes due.
- (3) An agreement to change the limitation period shall be in writing.
- (4) An agreement precluding limitation shall be null and void.

## 9. Please be informed that

- the processing is based on the contract or on the legitimate interest of the controller.
- the contact details are provided by the data controller's business partner,
- failure to provide data
  - In the case of legal persons, the consequences are that there may be difficulties in performing the contract, exercising the rights and fulfilling the obligations arising from the contract and cooperating between the parties.
  - in the case of natural persons, the consequence is that we cannot enter into a contractual relationship.
- the controller has performed a balancing test on the processing of personal data of natural persons acting on behalf of legal persons, as a result of which it is concluded that the interests or fundamental rights and freedoms of the data controller that would require the protection of personal data do not take precedence.

# Recipients to whom personal data are communicated

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

## 1. Data processors (who carry out the data processing on behalf of the data controller)

The data controller uses data processors in order to facilitate its own data management activities, as well as in order to fulfill its contractual obligations with the data subject and the obligations imposed by law.

- The controller places great emphasis on using only data processors who provide adequate guarantees to implement appropriate technical and organizational measures to ensure compliance with the requirements of data processing in the GDPR and to protect the rights of data subjects.
- The data processor and any person acting under the control of the data controller or the data processor who has access to the personal data shall process the personal data contained in these regulations only in accordance with the instructions of the data controller.
- The data controller is legally responsible for the activities of the data processor. The data controller is liable for damages caused by the data processing only if it has not complied with

the obligations specified in the GDPR, which are specifically imposed on the data processors, or if it has disregarded or acted contrary to the data controller's lawful instructions.

- The data processor does not have a meaningful decision regarding the handling of the data.
- The data controller may use a hosting provider to provide the IT background, and a courier service as a data processor to deliver the ordered products.

## 2. The data processors:

Data processing activities	Name, address, contact information
<b>Hosting service</b>	Contabo GmbH Aschauer Straße 32a 81549 München Tel.: 089 / 3564717 70 Fax: 089 / 216 658 62 Web: <a href="https://contabo.com">https://contabo.com</a> E-Mail: <a href="mailto:info@contabo.com">info@contabo.com</a>
<b>Other data processing (eg online invoicing, web development, marketing)</b>	Online invoicer: <a href="http://szamlazz.hu">szamlazz.hu</a> Company name: KBOSS.hu Kft. E-Mail: <a href="mailto:info@szamlazz.hu">info@szamlazz.hu</a> . As well as the hosting provider (previous point)

"Third party" means any natural or legal person, public authority, agency or any other body which is not the data subject, the controller, the processor or the persons who are authorized to process personal data under the direct control of the controller or processor; they got.

## 3. Transfer of data to third parties

Third-party data controllers process the personal data we provide on their own behalf and in accordance with their own privacy policies.

# Management of cookies

1. The so-called 'password-protected session cookies', 'shopping cart cookies', 'security cookies', 'Required cookies', 'Functional cookies', and 'cookies responsible for managing website statistics' does not require prior consent from those concerned.
2. The fact of data management, the scope of the managed data: Unique identification number, dates, times
3. Stakeholders: All stakeholders who visit the website.
4. Purpose of data management: Identify users and track visitors.
5. Duration of data processing, deadline for deleting data:

Cookie type	Legal basis for data management	Duration
Session cookie	2001 CVIII on certain issues of electronic commerce services and information society services. Act (Elkertv.) 13 / A. § (3)	until the end of the visitor session



Permanent or saved cookies	2001 CVIII on certain issues of electronic commerce services and information society services. Act (Elkertv.) 13 / A. § (3)	until the deletion of the data subject
Statistical, marketing cookies	2001 CVIII on certain issues of electronic commerce services and information society services. Act (Elkertv.) 13 / A. § (3)	1 month - 2 years

6. Identity of potential data controllers entitled to access the data: The data controller does not process personal data using cookies.

7. Description of the data subjects' rights related to data management: The data subject has the possibility to delete cookies in the Tools / Settings menu of the browser, usually under the settings of the Privacy menu item.

8. Legal basis for data processing: The consent of the data subject is not required if the sole purpose of the use of cookies is the transmission of communications via an electronic communications network or the provision of an information society service specifically requested by the subscriber or user.

9. Most browsers used by our users allow you to set which cookies to save and allow (specific) cookies to be deleted again. If you restrict the storage of cookies on certain websites or do not allow third-party cookies, this may in certain circumstances result in our website no longer being used in its entirety.

Here's how to customize cookie settings for standard browsers:

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

Internet Explorer (<https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>)

Firefox (<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>)

Safari (<https://support.apple.com/en-gb/guide/safari/sfri11471/mac>)

## Google Analytics

1. This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses so-called "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

2. The information created by the cookie about the website used by you will normally be stored and stored on a Google server in the USA. By activating IP anonymization on the Website, Google will shorten the User's IP address within the Member States of the European Union or in other States party to the Agreement on the European Economic Area.

3. The full IP address will be transmitted to and truncated to Google's server in the United States only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the user has used the website, to provide the website operator with reports on website activity and to provide additional services related to website and internet usage.

4. Within the framework of Google Analytics, the IP address transmitted by the User's browser is not reconciled with other data of Google. The User may prevent the storage of cookies by setting the appropriate browser, however, please note that in this case, not all functions of this website may be fully available. You may also prevent Google from collecting and processing your information about

your use of the Website (including your IP address) by cookies by downloading and installing the browser plugin available at the following link. [https://tools.google.com/dlpage/gaoptout?hl=en\\_US](https://tools.google.com/dlpage/gaoptout?hl=en_US)

## Google Tag Manager

Google Tag Manager is a service provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"), which allows you to create, update and manage tags (tags). Tags are small pieces of code on our website that are used, among other things, to measure traffic and visitor behavior, and to determine the impact of online advertising and social channels. When you visit our website, the current tag configuration will be sent to your browser. This will give you instructions on which tags to activate. The device itself does not collect any personal data, but ensures the activation of other tags that may in turn collect data. For more information on how Google Tag Manager works, please visit [https://support.google.com/tagmanager/answer/6102821?hl=en\\_US](https://support.google.com/tagmanager/answer/6102821?hl=en_US) and our Terms and Conditions: <https://www.google.de/tagmanager/use-policy.html>

## Facebook pixel

A Facebook pixel is a code that is used to report conversions on a website, compile target audiences, and give the page owner detailed analytics data about visitors' use of the website. With the help of the Facebook remarketing pixel tracking code, you can display personalized offers and advertisements on the Facebook interface to the visitors of the website. The Facebook remarketing list is not personally identifiable. You can find more information about Facebook Pixel / Facebook Pixel at: <https://www.facebook.com/business/help/651294705016616>

## Facebook re-marketing

Fact of data collection, scope of data processed and purpose of data management:

<b>Personal data</b>	<b>Purpose of data management</b>	<b>Legal basis</b>
E-mail address	Remarketing, displaying targeted ads by Facebook.	The consent of the data subject, Article 6 (1) (a). Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activity. Section 6 (5) of the Act.

5. Stakeholders: All stakeholders who contribute to Facebook remarketing and targeted advertising.

6. Purpose of data management: Targeted display of advertising content to the data subject.

7. Duration of the data processing, deadline for deleting the data: The data processing lasts until the withdrawal of the consent.

8. Identity of potential data controllers entitled to access the data, recipients of personal data: Personal data may be processed by the data controller and its sales and marketing staff, in compliance with the above principles.
9. Description of data subjects' rights in relation to data processing: The data subject may request from the controller access to, rectification, erasure or restriction of the processing of personal data concerning him or her, and may object to the processing of your personal data and the data subject has the right to data portability and to withdraw his or her consent at any time.
10. Access to, deletion, modification or restriction of the processing of personal data, portability of data or protest may be initiated by the data subject in the following ways:
- by post at the address 1172 Budapest, Aranykút utca 76. Hungary
  - by e-mail to [info@zatoge.com](mailto:info@zatoge.com),
  - by phone at 00491323297937.
11. Please be informed that the withdrawal of consent shall not affect the lawfulness of the consent-based data processing prior to the withdrawal.

Recipient Name: Facebook Inc., Address: 1601 Willow Road Menlo Park, CA 94025 United States

## **Community sites**

1. The fact of data collection, the range of data managed: Facebook / Twitter / Pinterest / Youtube / Instagram, etc. registered name on social networking sites and the user's public profile picture.
2. Stakeholders: All stakeholders who have registered on Facebook / Twitter / Pinterest / Youtube / Instagram, etc. social sites and “liked” the Service Provider's social site or contacted the data controller via the social site.
3. The purpose of data collection: To share, “like”, follow, and promote certain content elements, products, promotions or the website itself on social media.
4. Duration of data processing, deadline for deletion of data, identity of potential data controllers entitled to access the data and description of data subjects' rights related to data processing: The data subject can find out about the source of the data and its processing. Data management is carried out on social networking sites, so the duration and method of data management, as well as the possibilities of deleting and modifying data are regulated by the given social networking site.
5. Legal basis for data processing: the voluntary consent of the data subject to the processing of his or her personal data on social networking sites.

## **Customer relations and other data management**

1. Should the data controller have any questions or problems during the use of our data management services, he / she may contact the data controller in the ways provided on the website (telephone, e-mail, social networking sites, etc.).

2. Data controller for incoming emails, messages, phone, Facebook, etc. will delete the data provided together with the name and e-mail address of the interested party, as well as other personal data voluntarily provided, no later than 2 years after the communication.
3. Information on data processing not listed in this prospectus is provided at the time of data collection.
4. Upon exceptional official request, or in case of requesting other bodies based on the authorization of legislation, the Service Provider is obliged to provide information, communicate and hand over data, and make documents available.
5. In these cases, the Service Provider will provide the requester with personal data only to the extent and to the extent that is absolutely necessary for the realization of the purpose of the request, provided that it has indicated the exact purpose and scope of the data.

## **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 such processing is in progress, you have the right to access your personal data and the information listed in the Regulation.

### 2. Right to rectification

You have the right, at the request of the data controller, to correct inaccurate personal data concerning you without undue delay. Taking into account the purpose of the data processing, you have the right to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary statement.

### 3. Right of cancellation

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

### 4. The right to be forgotten

If the controller has disclosed the personal data and is obliged to delete it, it shall take reasonable steps, including technical measures, taking into account the available technology and the costs of implementation, to inform the controllers that you have requested deleting links or copies or duplicates of the personal data in question.

### 5. Right to restrict data processing

You have the right, at the request of the controller, to restrict the processing if one of the following conditions is met:

- You dispute the accuracy of the personal data; in which case the restriction applies to the period of time that allows the controller to verify the accuracy of the personal data;

- the data processing is illegal and you oppose the deletion of the data and instead ask for a restriction on its use;
- the data controller no longer needs the personal data for the purpose of data processing, but you request them to make, enforce or protect legal claims;
- You objected to the data processing; in this case, the restriction applies until it is established whether the legitimate reasons of the controller take precedence over your legitimate reasons.

## 6. The right to data portability

You have the right to receive personal data about you provided by you to a data controller in a structured, widely used, machine-readable format, and you have the right to transfer this data to another data controller without being hindered by the data controller who provided personal data to you (...)

## 7. Right to protest

In the case of data processing based on a legitimate interest or public authority as a legal basis, 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. Protest in case of direct business acquisition

If personal data is processed for the purpose of direct business acquisition, 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 business acquisition. If you object to the processing of personal data for the purpose of direct business acquisition, the personal data may no longer be processed for this purpose.

## 9. Automated decision making in individual cases, including profiling

You have the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effects on you or affect you to a similar extent. The preceding paragraph shall not apply if the decision:

- Necessary for the conclusion or performance of a contract between you and the data controller;
- is governed by EU 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 expressed consent.

## **Deadline for action**

The controller will inform you without undue delay, but in any case, within 1 month of receipt of the request, of the action taken on the above requests.

If necessary, it can be extended by 2 months. The data controller shall inform you of the extension of the deadline, indicating the reasons for the delay, within 1 month from the receipt of the request.

If the controller does not take action on your request, it will inform you without delay, but no later than one month after receipt of the request, of the reasons for the non-action and of the fact that you can lodge a complaint with a supervisory authority and have a judicial remedy.

## **Security of data management**

The controller and the processor shall take appropriate technical and organizational measures to take account of the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of the processing and the varying likelihood and severity of the risk to individuals' rights and freedoms, to guarantee a level of data security appropriate to the degree of risk, including, inter alia, where appropriate:

1. pseudonymization and encryption of personal data;
2. ensuring the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
3. in the event of a physical or technical incident, the ability to restore access to the availability of personal data in a timely manner;
4. a procedure for regular testing, assessment and evaluation of the effectiveness of the technical and organizational measures taken to ensure the security of data processing.
5. The processed data must be stored in such a way that they cannot be accessed by unauthorized persons. In the case of paper-based data carriers, by establishing the order of physical storage and archiving, in the case of data processed in electronic form, by applying a central rights management system.
6. The method of storing data by computer means shall be chosen in such a way that their erasure can be carried out at the end of the erasure period or, if necessary for other reasons, taking into account any different erasure period. Deletion must be irreversible.
7. Paper-based data carriers shall be deprived of personal data by means of a shredder or by an external organization specializing in shredding. In the case of electronic media, the rules on the disposal of electronic media shall provide for physical destruction and, where necessary, for the secure and irreversible erasure of data in advance.
8. The controller shall take the following specific data security measures:

In order to ensure the security of personal data processed on paper, the Service Provider applies the following measures (physical protection):

1. Store documents in a safe, lockable, dry room.
2. Where personal data processed on paper are digitized, the rules governing digitally stored documents shall apply.

3. The employee of the Service Provider performing data management may leave the room where data management is taking place in the course of his / her work only by closing the data carriers entrusted to him / her or by closing the given room.
4. Personal data may only be disclosed to authorized persons and may not be accessed by third parties.
5. The Service Provider's building and premises are equipped with fire protection and property protection equipment.

IT protection:

1. Computers and mobile devices (other data carriers) used in data management are the property of the Service Provider.
2. The computer system containing the personal data used by the Service Provider is equipped with virus protection.
3. In order to ensure the security of digitally stored data, the Service Provider uses data backups and archives.
4. The central server machine can only be accessed with appropriate authority and by designated persons.
5. Data on computers can only be accessed with a username and password.

## **Informing the data subject about the data protection incident**

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

The information provided to the data subject shall clearly and intelligibly describe 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; the likely consequences of the data protection incident must be described; describe the measures taken or planned by the controller to remedy the data protection incident, including, where appropriate, measures to mitigate any adverse consequences arising from the data protection incident.

The data subject need not be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organizational protection measures and these measures have been applied to the data affected by the data protection incident, in particular those measures, such as the use of encryption, which make it incomprehensible to persons not authorized to access personal data;
- the controller 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 subject shall be informed through publicly available information or a similar measure shall be taken to ensure that the data subject is informed in an equally effective manner.

If the data controller has not yet notified the data subject of the data protection incident, the supervisory authority may, after considering whether the data protection incident is likely to involve a high risk, order that the data subject be informed.

## **Report a privacy incident to the authority**

The data protection incident shall be reported by the controller to the supervisory authority competent under 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 not likely to jeopardize the rights and freedoms of individuals. If the notification is not made within 72 hours, the reasons for the delay must be provided.

## **Review in case of mandatory data management**

If the duration of the mandatory data processing or the periodic review of the need for it is not specified by law, a local government decree or a mandatory legal act of the European Union, the data controller shall review at least every three years whether the processing of personal data is necessary for the purpose of data processing.

The circumstances and results of this review shall be documented by the controller, which shall keep this documentation for ten years after the review and shall make it available to the Authority upon request of the National Data Protection and Freedom of Information Authority (hereinafter: the Authority).

## **Possibility to complain**

Complaints against possible breaches of the data controller can be lodged with the National Data Protection and Freedom of Information Authority:

National Data Protection and Freedom of Information Authority

1055 Budapest, Falk Miksa utca 9-11. Hungary

Mailing address: 1363 Budapest, Pf. 9. Hungary

Phone: +36 -1-391-1400

Fax: + 36-1-391-1410

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



## Closing remarks

During the preparation of the prospectus, we took into account the following legislation:

- On the protection of individuals 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) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (GDPR) (27. April, 2016);
- 2011 CXII. Act on the Right to Information Self-Determination and Freedom of Information (hereinafter: the Information Act);
- CVIII of 2001 Act - on certain issues of electronic commerce services and services related to the information society (mainly § 13 / A);
- XLVII of 2008 Act on the Prohibition of Unfair Commercial Practices against Consumers;
- XLVIII of 2008 Act on the Basic Conditions and Certain Restrictions of Commercial Advertising (especially Section 6a);
- 2005 XC. Electronic Freedom of Information Act;
- Act C of 2003 on Electronic Communications (specifically Section 155a);
- 16/2011. s. opinion on the EASA / IAC Recommendation on Best Practices for Behavioral Online Advertising;
- Recommendation of the National Authority for Data Protection and Freedom of Information on data protection requirements for prior information.

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