

Lazardaniel.comDATA PROCESSING NOTICE

Lazar Daniel György ev

Privacy Policy

Introduction

Lázár **Dániel György ev (Ugron Gábor utca 34., tax number: 57637246-1-43,)**

(hereinafter referred to as: Service Provider, data controller) submits itself to the following regulations:

on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and Directive 95/46/

In accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 repealing the General Data Protection Regulation (GDPR), we hereby provide the following information.

This privacy policy governs the data processing of the following sites: <https://www.lazardaniel.com>

The privacy policy is available at the following page: <https://www.lazardaniel.com/data-protection-information>

Amendments to the policy will enter into force upon publication at the above address.

The data controller and their contact details

Name: Lázár Dániel György ev

Headquarters: Ugron Gábor Street 34.

Email: info@lazardaniel.com

Phone: +3630 592 9986

Definitions of terms

1. 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. "processing" means any operation or set of operations which is performed on personal data or on data files, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available on personal data. by making available, harmonization or combination, restriction, erasure 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 controller specific criteria for its designation may also be laid down in Union or Member State law;
4. 'processor' means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

5. 'recipient' means the natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether or not a third party. Public authorities which, in the context of an individual investigation, have access to personal data in accordance with Union or Member State law

data, are not considered recipients; the said data are processing by 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 any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject means a statement or affirmation expressing in an unambiguous manner indicates by action that he/she gives his/her consent to the processing of personal data concerning him/her to manage data;

7. 'data breach' means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Principles for the processing of personal data

Personal data:

1. processing must be carried out lawfully and fairly, and in a manner that is transparent to the data subject ("lawfulness, fairness and transparency");
2. collected only for specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes in accordance with Article 89(1), archiving in the public interest shall not be considered incompatible with the original purpose.

further processing for scientific and historical research purposes or statistical purposes ("purpose limitation");

3. they must be adequate and relevant in relation to the purposes of the processing and limited to what is necessary ("data economy");

4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes of the processing, are erased or rectified without delay ("accuracy");

5. shall 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 are processed; personal data may be stored for a longer period only if the personal data are processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1), and in accordance with appropriate measures to protect the rights and freedoms of data subjects provided for in this Regulation.

subject to the implementation of technical and organizational measures ("limited storage capacity");

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

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

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

Data processing related to the operation of the web store/use of services

1. The fact of data collection, the scope of data processed and the **purpose of data processing**:

Personal data	Purpose of data processing	Legal basis
Username	Identification, enabling registration.	under Article 6 (1) of the GDPR for exercising the right of paragraph.
Password	Access to the user account provides safe entry.	
Last name and first name	It is necessary for contacting, for purchasing under Article 6 (1) of the GDPR, for issuing a proper invoice, and for exercising the right of withdrawal under Article 13/A. (3) of the Elker Act.	
Email address	Staying in touch.	
Phone number	More efficient coordination of communication, billing, or shipping issues.	
Billing name and address	Issuing a proper invoice, creating a contract, defining its content, modifying it, monitoring its performance, invoicing the fees arising from it, and enforcing claims related to it.	Article 6(1)(c) and Section 169(2) of Act C of 2000 on Accounting
Shipping name and address	Enabling home delivery.	Article 6(1)(b) of the GDPR and Section 13/A. (3) of the Electricity Act.
Time of purchase/registration	Technical operation performed.	
IP address at the time of purchase/registration	Performing a technical operation.	

Neither the username nor the email address is required to contain personal information.

2. Scope of data subjects: All registered/purchasers on the webshop website concerned.

3. Duration of data processing, deadline for erasure of data: If one of the conditions set out in Article 17(1) of the GDPR applies, it shall last until the data subject requests erasure. The data controller shall inform the data subject electronically of the erasure of any personal data provided by the data subject pursuant to Article 19 of the GDPR. If the data subject's request for erasure extends to the data subject's

also to the e-mail address provided, the data controller will also delete the e-mail address after informing you. Except in the case of accounting documents, since these data must be retained for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting. The contractual data of the data subject may be deleted upon the expiry of the civil law limitation period based on the data subject's request for deletion.

Accounting documents directly and indirectly supporting the accounting settlement (including general ledger accounts, analytical and detailed records), must be kept in a legible form for at least 8 years, retrievable by reference to the accounting records.

4. The identity of potential data controllers authorized to view the data, recipients of personal data: Personal data may be processed by the data controller, as well as its sales and marketing staff, in compliance with the above principles.

5. Description of the rights of data subjects regarding data processing:

- The data subject may request from the data controller access to, correction, deletion or limiting its treatment, and
- the data subject has the right to data portability and to withdraw consent at any time.

6. The data subject can request access to, deletion, modification or restriction of processing of personal data, as well as data portability in the following ways:

- by post at Ugron Gábor utca 34, • by e-mail at info@lazardaniel.com,
- by phone at +3630 592 9986.

7. Legal basis for data processing:

1. Article 6(1)(b) and (c) of the GDPR,
2. Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (hereinafter: Elker Act) Section 13/A (3):

The service provider may process personal data for the purpose of providing the service that is technically indispensable for the provision of the service. All other conditions being the same, the service provider must select and in all cases operate the means used in the provision of the information society service in such a way that personal data are processed only if this is absolutely necessary for the provision of the service and for the fulfilment of other purposes specified in this Act, but even then only to the extent and for the period necessary.

3. In the case of issuing an invoice in accordance with accounting legislation, Article 6(1)(c).
4. In the case of enforcing claims arising from the contract, 5 years according to Section 6:21 of Act V of 2013 on the Civil Code.

§ 6:22 [Limitation]

- (1) Unless otherwise provided by this Act, claims shall expire after five years.

away.

- (2) The limitation period begins when the claim becomes due.

- (3) An agreement to change the limitation period must be in writing.

- (4) An agreement excluding the limitation period is void.

8. We inform you that

- **data processing for the performance of the contract and the provision of an offer necessary.**
- **you are required** to provide personal data so that we can process your order to fulfill.
- failure to provide data has the **consequence** that
We are unable to process your order.

Customer relations

1. The fact of data collection, the scope of data processed and the purpose of data processing:

Personal data	Purpose of data processing	Legal basis
Name, email address, phone number.	Contact, identification, fulfillment of contracts, business purpose.	Article 6(1)(b) and (c), in the case of enforcing claims arising from a contract, Section 6:21 of Act V of 2013 on the Civil Code

2. Scope of data subjects: All data subjects who are in contact with the data controller by telephone/email/in person or who have a contractual relationship.

3. Duration of data processing, deadline for data deletion: Letters containing inquiries will last until the data subject requests deletion, but maximum 2 years.

4. The identity of potential data controllers authorized to access the data, recipients of personal data: Personal data may be processed by the data controller's authorized employees, in compliance with the above principles.

5. Description of the rights of data subjects regarding data processing:

- The data subject may request from the data controller access to, correction, deletion or limiting its treatment, and
- the data subject has the right to data portability and to withdraw consent at any time.

6. The data subject can request access to, deletion, modification or restriction of processing of personal data, as well as data portability in the following ways:

- by post at Ugron Gábor utca 34, • by e-mail at info@lazardaniel.com,
- by phone at +3630 592 9986.

7. Legal basis for data processing:

We inform you that

- **data processing for the performance of the contract and the provision of an offer necessary.**
- **you are required** to provide personal data so that we can process the contract to fulfill/fulfill another request.
- failure to provide data has the **consequence** that we are unable to fulfill the contract/process your request.

Newsletter, DM activity

1. Pursuant to Section 6 of Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Economic Advertising Activity, the User may give prior and express consent to the Service Provider contacting him/her with advertising offers and other communications at the contact details provided upon registration.

2. Furthermore, the Customer, taking into account the provisions of this information, may consent to the Service Provider processing his/her personal data necessary for sending advertising offers.

3. The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from receiving offers free of charge, without restriction or justification. In this case, the Service Provider will delete all personal data necessary for sending advertising messages from its records and will not contact the User with further advertising offers. The User may unsubscribe from advertisements by
by clicking on the link in the message.

4. The fact of data collection, the scope of data processed and the **purpose of data processing**:

Personal data	The purpose of data	Legal basis
Name, email address.	processing is to enable identification and subscription to the newsletter/ promotional coupons.	The consent of the data subject, Article 6(1)(a).
Date of subscription	Performing a technical operation.	Section 6 (5) of Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities.
IP address at the time of registration	Performing a technical operation.	

5. Scope of data subjects: All data subjects who subscribe to the newsletter.

6. Purpose of data processing: sending electronic messages containing advertising (e-mail, SMS, push message) to the data subject, providing information about current information, products, promotions, new functions, etc.

7. Duration of data management, deadline for data deletion: data management lasts until the consent is withdrawn, i.e. until unsubscription.

8. Potential data controllers authorized to access the data, recipients of personal data:

Personal data may be processed by the data controller, as well as its sales and marketing staff, in compliance with the above principles.

9. Description of the rights of data subjects regarding data processing:

- The data subject may request from the data controller access to, correction, deletion or limiting its treatment, and
- you may object to the processing of your personal data
- and • the data subject has the right to data portability and to withdraw consent at any time.

10. The data subject may request access to, erasure, modification or restriction of processing of personal data, data portability or objection in the following ways:

- by post at Ugron Gábor utca 34, • by e-mail at info@lazardaniel.com,
- by phone at +3630 592 9986.

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

12. We inform you that

- **data processing is based on your consent and the service provider's legitimate interests** based on its interests .
- **you are required** to provide personal data if you want to receive a newsletter from us.
- failure to provide data has the **consequence** that We cannot send you a newsletter.
- we inform you that you can withdraw your consent at any time by clicking unsubscribe.
- the withdrawal of consent **does not affect the processing based on consent, the lawfulness of data processing before withdrawal.**

Complaints handling

1. The fact of data collection, the scope of data processed and the **purpose of data processing**:

Personal data	Purpose of data processing	Legal basis
Last name and first name	Identification, contact.	Article 6(1)(c) and Act CLV of 1997 on Consumer Protection 17/ Section A, paragraph (7).
Email address	Staying in touch.	
Phone number	Staying in touch.	
Billing name and address	Identification and handling of quality complaints, questions and problems arising in connection with ordered products.	

2. Scope of data subjects: All data subjects who purchase on the website and have quality complaints or complaints.

3. Duration of data processing, deadline for deletion of data: The minutes, transcript and copies of the response to the objection must be kept for 5 years pursuant to Section 17/A. (7) of Act CLV of 1997 on Consumer Protection.

4. The identity of potential data controllers authorized to view the data, recipients of personal data: Personal data may be processed by the data controller, as well as its sales and marketing staff, in compliance with the above principles.

5. Description of the rights of data subjects regarding data processing:

- The data subject may request from the data controller access to, rectification, erasure or restriction of processing of personal data concerning him or her, and
- the data subject has the right to data portability and to withdraw consent at any time

6. The data subject can request access to, deletion, modification or restriction of processing of personal data, as well as data portability in the following ways:

- by post at Ugron Gábor utca 34, • by e-mail at info@lazardaniel.com,
- by phone at +3630 592 9986.

7. We inform you that

- the provision of personal data is based on **a legal obligation** . • the processing of personal data **is a prerequisite** for concluding a contract . • **you are obliged** to provide personal data so that we can handle your complaint. • failure to provide data has the **consequence** that

We are unable to handle the complaint you have received.

Managing cookies

1. It is not necessary to request prior consent from the data subjects for the use of the so-called “password-protected session cookies”, “shopping cart cookies”, “security cookies”, “Necessary cookies”, “Functional cookies”, and “cookies responsible for managing website statistics”.

2. The fact of data processing, the scope of data processed: Unique identification number, dates, times

3. Scope of data subjects: All data subjects who visit the website.

4. Purpose of data processing: Identification of users and tracking of visitors following.

5. Duration of data processing, deadline for data deletion: Section 13/A (3) paragraph.

6. Person of possible data controllers authorized to view the data: The data controller does not process personal data using cookies.

Cookie name	Purpose	Domain	Description	Expiration date
1P_JAR	Targeted advertising	.google.com	This cookie provides information about how the end user uses the website and any advertisements that the end user may have seen before visiting the website.	1 year
ANID			We also use one or more cookies to target ads. One of the main advertising cookies is "IDE", which is present on non-Google websites, doubleclick.net are stored by browsers under the domain. Another one is on google.com stored, called ANID. We also use other cookies, such as DSID, FLC, AID, TAID, and Exchange_uid. These are used by other Google services, such as YouTube, to show you more relevant ads.	1 year
APISID			This DoubleClick cookie is typically set by advertising partners through the website and is used by them to build a profile of website visitors and display relevant ads on other websites. This cookie works by uniquely identifying your browser and device.	1 year
CONSENT			This cookie provides information about how the end user uses the website and any advertisements that the end user may have seen before visiting the website.	1/1/2038
HSID			This cookie is set by DoubleClick (owned by Google) to help build a profile of your interests and show you relevant ads on other websites.	2 years
NID			This cookie is set by DoubleClick (owned by Google) to help build a profile of your interests and show you relevant ads on other websites.	1 year
SAPISID			This DoubleClick cookie is typically set by advertising partners through the website and is used by them to build a profile of website visitors and display relevant ads on other websites. This cookie works by uniquely identifying your browser and device.	2 years
SEARCH_SAMESITE			These cookies are used to display advertisements that are more relevant to you and your interests. It helps you determine how many times an ad is displayed and helps you measure the effectiveness of your advertising campaign. These are usually placed by advertising networks with the permission of the website operator. These cookies store information that you have visited a website and share this information with other organisations, such as advertisers. Often, targeting or advertising cookies are linked to website features provided by the other organisation.	1 year
SID			This is a very common cookie name, but where it is used as a session cookie, it is used to manage session state.	2 years
SIDCC			This cookie provides information about how the end user uses the website and any advertisements that the end user may have seen before visiting the website.	1 year
SSID			This cookie provides information about how the end user uses the website and any advertisements that the end user may have seen before visiting the website.	2 years
_fbp			Facebook uses it to deliver a range of advertising products, such as real-time bidding from third-party advertisers	
catAccCookies			This cookie is used to manage a cookie consent plugin to record the end user's acceptance of the website's use of cookies.	1 month

_ga	Funkco	www.lazardan-iel.com	This cookie belongs to Google Universal Analytics, a widely used analytics service by Google. This cookie is used to distinguish unique users by assigning a randomly generated number as a client ID. This is included in each request to the website and calculates visitor, session and campaign data for website analytics reports.	2 years
time zone			This cookie is used for tracking purposes.	1 session
tk_ai			This cookie is used for tracking purposes.	1 session
webmail session			Sending an email via the website.	1 session
woocommerce_cart_hash			Helps determine when cart content/data changes.	1 session
woocommerce_items_in_cart			Helps determine when the cart changes content / data.	1 session
wordpress_logged_in_[hash]			Indicates when the user is logged out/logged in.	1 session
wp-settings-time-1			The time it took for wp-settings-{user} to be set to 1 year	
wp_woocommerce_session_[hash]			It contains a unique code for each customer, which corresponds to an entry in the unique wp_woocommerce_sessions table in the database.	2 days

7. Description of the rights of the data subjects regarding data processing: The data subject has the option to delete cookies in the browsers Tools/ In the Settings menu, usually under the Privacy settings.

8. Legal basis for data processing: Consent from the data subject is not required if the sole purpose of using cookies is to transmit communications via an electronic communications network or to enable the subscriber to do so. or the service provider absolutely needs to provide an information society service specifically requested by a user

there is.

9. Most browsers used by our users allow you to set which cookies should be saved and to delete (certain) cookies again. If you restrict the saving of cookies on certain websites or do not allow third-party cookies, this may in certain circumstances mean that our website can no longer be used in its entirety. Here you will find information on how to customize your cookie settings for common browsers:

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

Firefox (<https://support.mozilla.org/hu/kb/sutik-engedelizeze-es-tiltasa-amit-website-benefits>)

Safari (https://support.apple.com/kb/PH21411?locale=hu_HU)

Using Google Ads conversion tracking

1. The data controller uses the online advertising program called “Google Ads” and, within its framework, uses Google conversion tracking.
Google Conversion Tracking is a service provided by Google Inc. service (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; “Google”).
2. When a User reaches a website through a Google ad, a cookie required for conversion tracking is placed on their computer.
These cookies have a limited validity and do not contain any personal data, so the User does not identifiable by them.
3. When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller can see that the User clicked on the advertisement.
4. Each Google Ads customer receives a different cookie, so they cannot be tracked across Ads customers' websites.
5. The information – obtained using conversion tracking cookies – serves the purpose of generating conversion statistics for Ads customers who have opted for conversion tracking. This way, customers are informed about the number of people who clicked on their ads and were able to track their conversions.
about the number of users redirected to a page labeled with
they do not have access to information that any
user could be identified.

6. If you do not want to participate in conversion tracking, you can do this

You can refuse this by disabling the installation of cookies in your browser. You will then not be included in the in conversion tracking statistics.

7. Further information and Google's privacy policy can be found at available at : www.google.de/policies/privacy/

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 saved on your computer, to help the website operator analyze how users use the website.

2. The information generated by cookies about the website used by the User is usually transferred to a Google server in the USA.

are sent and stored. By activating IP anonymization on the website,

Google will shorten the User's IP address beforehand within member states of the European Union or in other states party to the Agreement on the European Economic Area.

3. Transmission of the full IP address to a Google server in the USA will only be forwarded and shortened there in exceptional cases

On behalf of the operator of this website, Google will use this information to evaluate how the User uses the website, to compile reports on website activity for the website operator and to provide other services relating to website and internet usage.

4. Within the framework of Google Analytics, the IP address transmitted by the User's browser is not linked to other Google data. The User can disable the storage of cookies in the settings of his browser.

You can prevent this by setting your browser to "Avoid cookies", but please note that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting and processing the data generated by the cookie and relating to your use of the website (including your IP address) by downloading and installing the browser plugin available at the following link. [https://](https://tools.google.com/dlpage/gaoptout?hl=en)

tools.google.com/dlpage/gaoptout?hl=en

Data processors and recipients used

Hosting provider

1. Activity provided by the data processor: Hosting service

2. Name and contact details of the data processor:

Company name: Magyar Hosting Kft. Registered office: 1132 Budapest, Victor Hugo utca 18-22., Telephone 0-24: +36 1 700 2323, Email: info@mhosting.hu

3. The fact of data processing, the scope of data processed: All personal data provided by the data subject.

4. Scope of data subjects: All data subjects using the website.

5. Purpose of data processing: Making the website available, appropriate operation.

6. Duration of data processing, deadline for data deletion: The
between the data controller and the hosting provider

The data will remain valid until the agreement is terminated or the data subject submits a request for deletion to the hosting service provider.

data management.

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

Other data processors (if any)

szamlazz.hu KBOSS.hu Kft. 1031 Budapest, Záhony utca 7., Email:
info@szamlazz.hu, Phone: +36-30-35-44-789

ADDRESSEES TO WHOM PERSONAL DATA IS DISCLOSED

(DATA TRANSFER):

Online payment

1. Activity performed by the Recipient: Online payment
2. Name and contact details of the recipient:

Barion, Operator: Barion Payment Zrt. (registered office: 1117 Budapest, Infopark sétány 1. I. building, 5. floor 5.; court of registration: Court of Registration of the Metropolitan Court; company registration number: Cg. 01-10-048552; tax number: 25353192- 243., community tax number: HU25353192; activity license number: HEN-I-1064/2013, electronic money issuing institution identification number: 25353192)3. The fact of data processing, the scope of data processed: Billing data, name, email address

4. Scope of data subjects: All data subjects who choose to pay online by bank card on the website.
5. Purpose of data processing: Processing online payments, confirming transactions and providing users with fraud monitoring (checking for abuses) carried out to protect
6. Duration of data management, deadline for data deletion: Until the online payment is processed.

7. Legal basis for data processing: Article 6(1)(b) of the GDPR. The data processing at the request of the data subject required for completing online payments.

8. Rights of the data subject:

- a. You can obtain information about the circumstances of data processing,
- b. You have the right to receive feedback from the data controller regarding the processing of your personal data.
is in progress and you can access all information related to data processing.
- c. You have the right to receive your personal data in a structured, widely used, machine-readable format.
you will receive it in format.
- d. You have the right to have the controller rectify inaccurate personal data without undue delay upon your request.
your personal data.

Social media

- 1. The fact of data collection, the scope of data processed: Facebook/Twitter/Pinterest/
The user's registered name on social media sites such as Youtube/Instagram, etc., and their public profile picture.
- 2. Scope of data subjects: All data subjects who are registered on Facebook/ Twitter/Pinterest/Youtube/Instagram etc. on social media sites and "liked" the Service Provider's social media site or contacted the data controller via the social media site.
- 3. Purpose of data collection: Sharing, "liking", following and promoting certain content elements, products, promotions or the website itself on social media.
- 4. Duration of data processing, deadline for data deletion, identity of potential data controllers authorized to view the data and the

Description of the rights of data subjects related to data management: The data subject can find out about the source of the data, its management, the method of transfer and its legal basis on the given social media site. Data management is carried out on social media sites, so the duration and method of data management, as well as the possibilities for deleting and modifying data, are subject to the regulations of the given social media site.

5. Legal basis for data processing: the voluntary consent of the data subject to manage your data on social media sites.

Customer relations and other data processing

1. If the data subject has any questions or problems while using our data controller services, he/she may contact the data controller via the methods provided on the website (telephone, e-mail, social media, etc.).
2. The data controller will process the received emails, messages, telephone calls, Facebook on etc., together with the name and e-mail address of the interested party, as well as other voluntarily provided personal data, will be deleted no later than 2 years after the data was provided.
3. We will provide information about data processing not listed in this information when the data is collected.
4. In the event of an exceptional official request or a request from other bodies based on the authorization of the law, the Service Provider is obliged to provide information, communicate and transfer data, or provide documents. to make it available.
5. In these cases, the Service Provider will only provide the requester with personal data to the extent and insofar as it is absolutely necessary to achieve the purpose of the request, provided that the requester has indicated the precise 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 taking place, you have the right to access the personal data and the information listed in the regulation.

2. Right to rectification

You have the right to request that the controller rectify inaccurate personal data concerning you without undue delay. Taking into account the purpose of the processing, you have the right to request that incomplete personal data be completed, including by means of a supplementary statement.

3. Right to erasure

You have the right to request that the controller erase your personal data without undue delay, and the controller is obliged to erase your personal data without undue delay under certain conditions.

4. The right to be forgotten

Where the controller has made the personal data public and is obliged to erase them, the controller, taking into account available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform the controllers processing the data that you have requested the erasure of links to the personal data in question or of copies or replications of those personal data.

5. Right to restriction of data processing

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

- You contest the accuracy of the personal data, in which case the restriction shall apply for a period enabling the controller to verify the accuracy of the personal data;
- The processing is unlawful and you oppose the erasure of the data and request its erasure instead. calls for their use to be restricted;
- the data controller no longer needs the personal data for the purposes of data processing, but you require them for the establishment, exercise or defence of legal claims;
- you have objected to the data processing; in this case, the restriction applies to that applies for a period of time until it is determined whether the legitimate grounds of the data controller override your legitimate grounds opposite.

6. Right to data portability

You have the right to obtain information about you that a data controller has processed. receive the personal data provided to you in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to whom the personal data have been provided (...)

7. The right to object

In the case of data processing based on legitimate interest or public authority as legal grounds, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data (...), including profiling based on the aforementioned provisions.

8. Objection to direct marketing

If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such purposes, including profiling, insofar as it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for such purposes.

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

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

The previous paragraph shall not apply if the decision:

- Entering into or performing a contract between you and the data controller necessary for the benefit of;
- is permitted by Union or Member State law applicable to the controller and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests;
- or • is based on your explicit consent.

Deadline for action

The data controller will inform you of the measures taken in response to the above requests without undue delay, but in any case **within 1 month** of receipt of the request.

If necessary, this **can be extended by 2 months**. The deadline

The data controller will inform you of the extension **within 1 month** of receipt of the request, indicating the reasons for the delay .

If the controller does not take action on your request, **it shall inform you without delay, but no later than one month from the date of receipt of the request, of the reasons for the failure to take action** and of the possibility of lodging a complaint with a supervisory authority and of exercising your right to a judicial remedy.

Security of data processing

The controller and the processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the degree of risk, taking into account the state of the art and technology and the costs of implementation, the nature, scope, circumstances and purposes of the processing, and the varying likelihood and severity of the risk to the rights and freedoms of natural persons.

guarantees data security, including, among others, where applicable:

1. pseudonymisation and encryption of personal data; 2. ensuring the continued confidentiality, integrity, availability and resilience of systems and services used to process personal data;
3. the ability to access and make available personal data in the event of a physical or technical incident
his/her position can be reinstated in due time;
4. a procedure for regularly testing, assessing and evaluating the effectiveness of the technical and organizational measures taken to guarantee the security of data processing.
5. The processed data must be stored in such a way that unauthorized persons cannot access them. In the case of paper-based data carriers, by establishing a physical storage and archiving system, and in the case of data processed in electronic form, by establishing a central authorization management system.
by applying.
6. The method of storing data using IT methods must be chosen in such a way that their deletion – for a possibly different deletion deadline –

– when the data deletion deadline has expired or if necessary for other reasons, it can be carried out. Deletion is considered irreversible
It should be.

7. Paper-based data carriers must be stripped of personal data using a document shredder or by using an external organization specialized in document destruction. In the case of electronic data carriers, physical destruction must be ensured in accordance with the rules governing the disposal of electronic data carriers, or, if necessary, the data must be previously stored in a secure and

about its irreversible deletion.

8. The data controller takes the following specific data security measures:

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

1. Store documents in a secure, lockable, dry room.
to place.
2. If personal data processed on paper is digitized, the rules governing digitally stored documents shall apply.
3. The Service Provider's data processing employee may only leave the room where data processing is taking place during their work by locking the data carriers entrusted to them or by closing the given room.
4. Personal data may only be accessed by authorized persons,
third parties cannot access them.
5. The Service Provider's building and premises are fire and property protection
are equipped with equipment.

IT protection

1. Computers and mobile devices used during data processing
(other data carriers) are the property of the Service Provider.
2. The computer system containing 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 archiving.
4. Access to the central server machine is only allowed with appropriate authorization and only designated persons have access.
5. Access to data on computers with a username and password you can only access it.

Informing the data subject about the data protection incident

If the data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller

informs the data subject without undue delay.

The person concerned partially transmitted The notification must **clearly and intelligibly** describe the nature of the data protection incident and provide the name and contact details of the data protection officer or other contact person who can provide further information; describe the likely consequences of the data protection incident; describe the measures taken or planned by the data controller to remedy the data protection incident.

measures, including, where applicable, the measures resulting from the data protection incident measures to mitigate possible adverse consequences.

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

- the data controller **has implemented appropriate technical and organizational security measures** and these measures have been implemented by the applied to data affected by a data breach, especially those measures – such as encryption application – which **make the information unintelligible** to persons not authorized to access personal data **data;**

- the data controller has taken additional measures following the data protection incident to **ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialise in the future;**
- the provision of information **would require a disproportionate effort.** In such cases, the data subjects should be informed by means of publicly published information or a similar measure should be taken to ensure that the data subjects are informed in a similarly effective manner.

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

Reporting a data protection incident to the authority

The data protection incident shall be reported by the data controller without undue delay and if shall, as soon as possible and no later than 72 hours after having become aware of the personal data breach, notify the supervisory authority competent pursuant to Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by reasons justifying the delay.

Review in case of mandatory data processing

If the duration of mandatory data processing or the periodic review of its necessity is not determined by law, a local government decree, or a binding legal act of the European Union, **the data controller shall review at least every three years from the start of data processing** whether the processing of personal data by it or by a data processor acting on its behalf or on its instructions is necessary for the achievement of the purpose of the data processing .

The circumstances and results of this review **shall be documented by the data controller, this documentation shall be retained for ten years following the completion of the review** and shall be made available to the National Data Protection and Freedom of Information Authority (hereinafter referred to as the Authority) upon request.

Possibility to file a complaint

A complaint against a possible violation of the data controller can be filed with the National Data Protection and Freedom of Information Authority:

National Data Protection and Freedom of Information Authority

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, PO Box: 5.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Closing remarks

When preparing this information, we took into account the following legislation:

- 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 95/46/EC (General Data Protection Regulation) THE EUROPEAN PARLIAMENT AND THE COUNCIL (EU)
REGULATION 2016/679 (GDPR) (27 April 2016)
- Act CXII of 2011 – on the right to informational self-determination and
on Freedom of Information (hereinafter referred to as the Freedom of Information Act)
- Act CVIII of 2001 – on certain issues of electronic commerce services and services related to the information society (mainly Section 13/A)

- Act XLVII of 2008 – Unfair treatment of consumers
prohibition of commercial practices;
- Act XLVIII of 2008 – economic advertising activity is fundamental
on the conditions and certain limitations (especially §
6) • Act XC of 2005 on electronic freedom of information • Act C of
2003 on electronic communications (especially § 155) • Opinion No. 16/2011 on
the proven effectiveness of behavioral online advertising
EASA/IA Recommendation on the practice of
- The National Data Protection and Freedom of Information Authority recommends
prior information on data protection requirements