

# Privacy Policy - HungaryPlace

## 1. General Guidelines

- We collect and process personal data only in accordance with applicable laws.
- We transfer personal data to third parties only with consent.
- Under no circumstances do we sell the personal data we process to third parties.
- We store data as securely as possible.
- We only send newsletters to those who have given their prior and explicit consent.
- Data subjects may request access to, modification or deletion of the data stored about them at any time.

## 2. Details and Contact Information of Our Company (Data Controller, Service Provider)

Name of the Data Controller: Litkei Máté EV

Address of the Data Controller: 7900 Szigetvár, Perczel Mór u. 1.

Phone: +36 30 324 7504

Email: [info@hungaryplace.hu](mailto:info@hungaryplace.hu)

Web: <https://www.hungaryplace.hu>

Tax number: 59701916-2-22

The Service Provider reserves the right to amend this Privacy Notice, of which data subjects will be informed appropriately. Information relating to data processing is published on the **LINK MEGY IDE** website.

## 3. Definitions According to the GDPR (Regulation)

**3.1. data subject/User:** any identified natural person or natural person who can be identified, directly or indirectly, on the basis of personal data;

**3.2. personal data:** any data relating to the data subject – in particular the data subject's name, identification details and one or more factors specific to their physical, physiological, mental, economic, cultural or social identity – as well as any conclusion relating to the data subject that can be drawn from such data;

**3.3. consent:** a freely given and specific indication of the data subject's wishes, based on appropriate information, by which they give their unambiguous consent to the processing of personal data relating to them, either in full or for specific processing operations;

**3.4. data controller:** the natural or legal person, or organisation without legal personality, which, alone or jointly with others, determines the purposes of data processing, makes and implements decisions concerning data processing (including the means used), or has them implemented by a data processor;

**3.5. data processing:** any operation or set of operations performed on data, regardless of the procedure used, including in particular collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, restriction, deletion and destruction, as well as preventing further use of the data, taking photographs, audio or video recordings, and recording physical characteristics suitable for identifying a person (e.g. fingerprints or palm prints, DNA samples, iris images);

3.6. **data transfer:** making data available to a specified third party;

3.7. **disclosure:** making data available to anyone;

3.8. **data deletion:** rendering data unrecognisable in such a way that restoration is no longer possible;

3.9. **data processing activity:** performing technical tasks relating to data processing operations, regardless of the method and means used to perform the operations and the place where they are carried out, provided that the technical task is performed on the data;

3.10. **data processor:** a natural or legal person, or organisation without legal personality, which processes data on the basis of a contract, including contracts concluded pursuant to legal provisions;

3.11. **personal data breach:** unlawful processing of personal data, including in particular unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction or damage.

## 4. Scope of Processed Data, Purpose and Duration of Processing, and Data Processor

| Type of data processed | Purpose of processing                                            | Duration of processing     | Legal basis of processing    | Processor of the relevant personal data |
|------------------------|------------------------------------------------------------------|----------------------------|------------------------------|-----------------------------------------|
| Username               | Identification, registration.                                    | Until consent is withdrawn | Consent of the data subject. |                                         |
| Password               | Secure login to the user account.                                | Until consent is withdrawn | Consent of the data subject. |                                         |
| Name                   | Maintaining contact and discussing any questions that may arise. | Until consent is withdrawn | Consent of the data subject. |                                         |
| Email address          | Maintaining contact and discussing any questions that may arise. | Until consent is withdrawn | Consent of the data subject. |                                         |
| Telephone number       | Maintaining contact and discussing any questions that may arise. | Until consent is withdrawn | Consent of the data subject. |                                         |

|                                                 |                                                                                           |                                                                                        |                                                                                                                                                                                         |
|-------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Billing name and address                        | Issuing a legally compliant invoice, concluding and subsequently performing the contract. | The data are processed for 5 years in accordance with the civil law limitation period. | Issuing an invoice is mandatory pursuant to Section 159(1) of Act CXXVII of 2007 on Value Added Tax, and it must be retained pursuant to Section 169(2) of Act C of 2000 on Accounting. |
| Delivery name and address                       | Enabling home delivery.                                                                   | Until delivery of the ordered goods.                                                   | Performance of the contract. [Processing pursuant to Article 6(1)(b) of the Regulation]                                                                                                 |
| Date of purchase/registration                   | Proof of consent.                                                                         | Until expiry of the limitation period following termination of processing              | This obligation is prescribed by Article 7(1) of the Regulation. [Processing pursuant to Article 6(1)(c) of the Regulation]                                                             |
| IP address at the time of purchase/registration | Proof of consent.                                                                         | Until expiry of the limitation period following termination of processing              | This obligation is prescribed by Article 7(1) of the Regulation. [Processing pursuant to Article 6(1)(c) of the Regulation]                                                             |

Data subjects: all data subjects registered on and/or purchasing through the webshop website.

Personal data are shared solely and exclusively with the third party specified in the "Processor of the relevant personal data" column for the purpose of fulfilling contractual obligations.

#### **Details and duties of the data processors used during processing**

##### Hosting Provider

Name: InfoNetfort Kft.

Address: 7900 Szigetvár, Szent István ltp 17. IV/25.

Phone: +36-30/530-2953

Email: [kapcsolat@netfort.hu](mailto:kapcsolat@netfort.hu)

Web: [www.netfort.hu](http://www.netfort.hu)

Tax number: 26648082-2-02

Company registration number: 02 09 084205

##### Accounting services

##### Courier service

##### Direct marketing, newsletter

Name:

Address:

#### 4.1 Contact Form:

| Type of data processed                                               | Purpose of processing | Duration of processing                            | Legal basis of processing                       |
|----------------------------------------------------------------------|-----------------------|---------------------------------------------------|-------------------------------------------------|
| Name                                                                 | Contact               | For 90 days after the data subject's last contact | Consent of the data subject when making contact |
| Email address                                                        | Contact               | For 90 days after the data subject's last contact | Consent of the data subject when making contact |
| Telephone number                                                     | Contact               | For 90 days after the data subject's last contact | Consent of the data subject when making contact |
| Other personal data provided by the data subject when making contact |                       | For 90 days after the data subject's last contact | Consent of the data subject when making contact |

Data subjects: persons who contact us by telephone, email or through the contact form.

Personal data are not shared with third parties.

## 5. Newsletter, Direct Marketing Activities

We only send newsletters to Users who have given their prior and explicit consent. Consent is provided using the "Newsletter Subscription" form.

| Type of data processed                             | Purpose of processing    | Duration of processing          | Legal basis of processing                                        |
|----------------------------------------------------|--------------------------|---------------------------------|------------------------------------------------------------------|
| Name                                               | Sending newsletters      | Until withdrawal (unsubscribe). | Consent of the data subject                                      |
| Email address                                      | Sending newsletters      | Until withdrawal (unsubscribe). | Consent of the data subject                                      |
| Date of consent and the data subject's IP address. | Ability to prove consent | Until withdrawal (unsubscribe). | This obligation is prescribed by Article 7(1) of the Regulation. |

Data subjects: all data subjects subscribed to the newsletter.

Operator of the newsletter system and data processor:

Name:

Address:

### 5.1 Procedure for withdrawing consent (unsubscribing)

The data subject may unsubscribe from the newsletter at any time free of charge. Unsubscription may be carried out using the link included in newsletters or by sending an email to **EMAIL CÍM JÖN IDE**.

## 6. Cookie Management

### 6.1 What is a cookie?

When visiting the website, the Data Controller uses so-called cookies. A cookie is a package of information consisting of letters and numbers that our website sends to the data subject's browser in order to save certain settings, make our website easier to use and help us collect certain relevant statistical information about our visitors. Cookies do not contain personal information and are not suitable for identifying individual users. Cookies often contain a unique identifier – a secret, randomly generated string of numbers – which is stored on the data subject's device. Some cookies expire when the website is closed, while others are stored on the computer for a longer period.

### 6.2. Legal background and legal basis of cookie management

Cookies typically used by webshops include "cookies used for password-protected sessions", "cookies required for shopping baskets" and "security cookies", the use of which does not require prior consent from data subjects.

Fact of processing and scope of processed data: Unique identification number, dates, times

Data subjects: all data subjects visiting the website.

Purpose of processing: Identification of users and tracking of visitors.

Legal basis of processing: the consent of the data subject in accordance with Section 5(1)(a) of the Infotv.

6.3 Duration of processing and deadline for deletion of data: the website uses the following cookies:

- Security cookies: \_\_cfduid, \_biz\_flagsA, \_biz\_nA 3, \_biz\_pendingA, \_biz\_sid, \_biz\_uid
- Google Analytics cookies: \_ga, \_gid
- Cookies required for the proper functioning of the website:

Possible data controllers authorised to access the data: The Data Controller does not process personal data through the use of cookies.

Description of the data subjects' rights relating to processing: Data subjects may delete cookies in their browser's Tools/Settings menu, generally under the Privacy settings.

If the data subject does not accept the use of cookies, certain functions may not be available to them. Further information about deleting cookies is available at the following links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: [https://support.apple.com/kb/ph21411?locale=en\\_US](https://support.apple.com/kb/ph21411?locale=en_US)

## 7. Google Analytics

7.1. This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files stored on your computer that enable analysis of the User's use of the website.

7.2. Information generated by cookies concerning the User's use of the website is generally transmitted to and stored on a Google server in the USA. If IP anonymisation is activated on the website, Google will first truncate the User's IP address within Member States of the European Union or in other states party to the Agreement on the European Economic Area.

7.3. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there. On behalf of the operator of this website, Google will use this information to evaluate how the User has used the website, to compile reports on website activity for the website operator, and to provide other services relating to website and internet usage.

7.4. The IP address transmitted by the User's browser within the framework of Google Analytics will not be combined with other Google data. The User may prevent cookies from being stored by selecting the appropriate settings in their browser; however, please note that in this case some functions of this website may not be fully available. The User may also prevent Google from collecting and processing data generated by the cookies relating to their use of the website (including the IP address) by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=hu>

## **8. Google AdWords Conversion Tracking and Remarketing**

8.1. The Data Controller uses the online advertising programme known as "Google AdWords" and, within this framework, 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").

8.2. When the User reaches a website through a Google advertisement, a cookie required for conversion tracking is placed on their computer. These cookies have a limited validity period and do not contain any personal data, meaning that the User cannot be identified by them.

8.3. 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.

8.4. Each Google AdWords customer receives a different cookie, so these cookies cannot be tracked across the websites of AdWords customers.

8.5. Information obtained using conversion tracking cookies is used to compile conversion statistics for customers who have chosen AdWords conversion tracking. Customers are informed of the number of users who clicked on their advertisement and were redirected to a page containing a conversion tracking tag. However, they do not receive information that would allow any individual user to be identified.

8.6. If you do not wish to participate in conversion tracking, you may opt out by disabling the installation of cookies in your browser. The data subject will then not be included in conversion tracking statistics.

8.7. Further information and Google's Privacy Policy are available at: [www.google.de/policies/privacy/](http://www.google.de/policies/privacy/)

8.8. Google AdWords Remarketing

8.9. Processing for remarketing purposes is carried out using cookies.

### **Processed data**

Data processed by the cookies specified in the Cookie Notice.

### **Duration of processing**

The storage period of the relevant cookie; further information is available here:

Google general cookie information: <https://www.google.com/policies/technologies/types/>

Google Analytics information:

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

### **Legal basis of processing**

The voluntary consent of the data subject, which is provided to the Service Provider through use of

the website.

## **9. Rights of Data Subjects**

### **9.1 Right to information**

At the request of the data subject, the Service Provider, as Data Controller, shall provide information about data processed by it or by a processor commissioned by it, the source of such data, the purpose, legal basis and duration of processing, the name and address of the data processor and its activities relating to processing, the circumstances and effects of any personal data breach and the measures taken to remedy it, as well as, in the event of data transfer, the legal basis and recipient of the transfer. The Data Controller shall provide the information in an intelligible form as soon as possible after submission of the request, but no later than within 30 days, and in writing if requested by the data subject. This information is free of charge if the person requesting the information has not submitted a request concerning the same category of data to the Data Controller during the current year. In other cases, the Service Provider may charge a fee.

### **9.2 Right to rectification**

The Service Provider shall rectify personal data if they do not correspond to reality and accurate personal data are available to it.

### **9.3 Right to restriction**

The Service Provider shall restrict personal data if requested by the data subject or if, based on the information available to it, it can be assumed that deletion would prejudice the legitimate interests of the data subject. Restricted personal data may only be processed for as long as the purpose of processing that prevented deletion of the personal data continues to exist. The Service Provider shall mark the personal data it processes if the data subject disputes its correctness or accuracy but the incorrectness or inaccuracy of the disputed personal data cannot be clearly established.

### **9.4 Right to deletion**

The Service Provider shall delete personal data if their processing is unlawful, if the data subject requests deletion, if the processed data are incomplete or incorrect and this situation cannot lawfully be remedied – provided that deletion is not prohibited by law – if the purpose of processing has ceased, if the statutory retention period has expired, or if deletion has been ordered by a court or the Hungarian National Authority for Data Protection and Freedom of Information.

### **9.5 Procedural rules**

The Data Controller has 30 days to delete, restrict or rectify personal data. If the Data Controller does not comply with the data subject's request for rectification, restriction or deletion, it shall communicate the reasons for refusal in writing or, with the data subject's consent, electronically within 30 days. The Service Provider shall notify the data subject, as well as all parties to whom the data were previously transferred for processing purposes, of rectification, restriction, marking and deletion. Notification may be omitted if this does not prejudice the legitimate interests of the data subject having regard to the purpose of processing.

### **9.6 Objection**

The data subject may object to the processing of their personal data if

- a) processing or transfer of personal data is necessary solely for compliance with a legal obligation applicable to the Data Controller or for the purposes of pursuing the legitimate interests of the Data Controller, recipient or a third party, unless processing is required by law;
- b) in other cases specified by law.

The Service Provider shall examine the objection as soon as possible after submission of the request, but no later than within 15 days, decide whether it is justified and inform the applicant

of its decision in writing. If the Data Controller determines that the data subject's objection is justified, it shall cease processing, including any further collection and transfer of data, and restrict the data. It shall also notify all parties to whom the personal data concerned by the objection were previously transferred of the objection and the measures taken on the basis thereof, and such parties shall be required to take measures to enforce the right to object.

If the data subject disagrees with the Data Controller's decision, they may bring proceedings before a court within 30 days of being notified of the decision.

The Service Provider may not delete the data subject's data where processing is required by law. However, the data may not be transferred to the recipient if the Data Controller agrees with the objection or if a court establishes that the objection is justified.

#### 9.7. Right to data portability

Where processing is carried out by automated means, or where processing is based on the data subject's voluntary consent, the data subject has the right to request from the Data Controller the data which the data subject has provided to the Data Controller. The Data Controller shall provide these data in XML, JSON or CSV format and, where technically feasible, the data subject may request that the Data Controller transmit the data in this format to another data controller.

#### 9.8 Compensation and damages for infringement of personality rights

The Service Provider shall compensate for damage caused to another person by unlawful processing of the data subject's data or by breach of data security requirements. In the event of infringement of the data subject's personality rights, the data subject may claim damages for infringement of personality rights (Section 2:52 of the Civil Code). The Data Controller shall also be liable to the data subject for damage caused by the data processor. The Data Controller shall be exempt from liability if the damage was caused by an unavoidable event outside the scope of processing.

The Data Controller shall not compensate for damage, and damages for infringement of personality rights may not be claimed, to the extent that the damage or infringement was caused by the intentional or grossly negligent conduct of the injured party or the data subject.

#### 9.9 Right to bring court proceedings

If the data subject's rights are infringed, they may bring proceedings against the Data Controller before a court. The court shall hear the case as a matter of priority.

#### 9.10 Complaint

**Complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information:**

Name: Hungarian National Authority for Data Protection and Freedom of Information

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Phone: +361/391-1400

Fax: +361/391-1410

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

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

## 10. Data Security

The Service Provider designs and carries out data processing operations in a manner that ensures protection of the privacy of data subjects.

The Service Provider and, within the scope of its activities, the Data Processor shall ensure data security, take the technical and organisational measures and establish the procedural rules necessary to enforce the provisions of the Infotv. and other data protection and confidentiality rules.

The Service Provider protects data through appropriate measures, in particular against unauthorised access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction and damage, and against becoming inaccessible as a result of changes in the technology used.

During processing, the Service Provider maintains:

- confidentiality: protecting information so that it can only be accessed by authorised persons
- integrity: protecting the accuracy and completeness of information and processing methods
- availability: ensuring that authorised users can access the required information when needed and that the necessary related resources are available.

The IT systems and networks of the Service Provider and its partners involved in processing are protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flooding, as well as computer viruses, computer intrusion and denial-of-service attacks. The Operator ensures security through server-level and application-level protection procedures.

## **11. Applicable Legislation Used for this Privacy Notice**

- Act CXII of 2011 – on Informational Self-Determination and Freedom of Information (Infotv.)
- Act V of 2013 – on the Civil Code (Ptk.)
- Act CLV of 1997 – on Consumer Protection (Fgytv.)
- Act XIX of 1998 – on Criminal Procedure (Be.)
- Act CVIII of 2001 – on Certain Issues of Electronic Commerce Services and Information Society Services (Eker. tv.)
- Act C of 2003 – on Electronic Communications (Eht.)
- Act XLVIII of 2008 – on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Grt.)
- Recommendation of the Hungarian National Authority for Data Protection and Freedom of Information concerning data protection requirements for prior information
- GDPR, Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing and protection of personal data of natural persons and on the free movement of such data

*DÁTUM*

Beillesztett szöveg