



Privacy Policy

<https://complicense.hu/en/privacy-policy/>

Introduction

Tibor Vincze-Berez e.v. (21/1 Szent István park, Vácrátót, H-2163, Tax number: 90819618-2-33, Registration number: 60162023, from now: Service Provider, Data Controller) submits itself to the following regulation: REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (General Data Protection Regulation). We hereby provide the following information. This data protection regulation governs the data processing of the following websites/mobile applications: <https://complicense.hu>

The Privacy Policy information is available on the following page:

<https://complicense.hu/en/privacy-policy>

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

The Data Controller and contact details:

Name:	Tibor Vincze-Berez e.v.
Address:	21/1 Szent István park, Vácrátót, H-2163
Tax Number:	90819618-2-33
Registration number:	60162023
Statistical number:	90819618-6220-231-13
E-mail:	info@complicense.hu
Phone:	+36 20 458 9255
Web:	www.complicense.hu

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. *“data processing”* means any operation or set of operations which is performed on personal data or 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, alignment or combination, restriction, erasure or destruction;
3. *“data 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. *“data 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 personal data are disclosed, whether or not a third party. Public authorities which 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 recipients; the processing of such data by such public authorities shall be in accordance 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, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
7. *“data breach”* means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

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 further processed in a manner incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes (“purpose limitation”) shall not be considered incompatible with the initial purpose in accordance with Article 89 (1);
3. they must be adequate and relevant in relation to the purposes of the processing and limited to what is necessary (“data economy”);
4. must be 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 where 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), subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of data subjects as provided for in this Regulation (“storage limitation”);
6. must be processed 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 such compliance (“accountability”). The data controller declares that its data is processed in accordance with the principles set out in this point.

Data processing related to website operation / 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.	Article 6 (1) a) of the GDPR.
Password	It serves as a secure login to the user account.	
Last name and first name	It is necessary for contact, purchase, issuing a proper invoice, and exercising the right of withdrawal.	Article 6 (1) b) of the GDPR.
E-mail address	Staying in touch.	
Phone number	More efficient coordination of communication, billing, or shipping issues.	
Billing name and address	Issuing a proper invoice, as well as creating the contract, defining its content, modifying it, monitoring its performance, invoicing the fees arising from it, and enforcing the claims related to it.	Article 6 (1) c) The legal obligation is Section 169 (2) of Act C of 2000 on Accounting
Shipping name and address	Enabling home delivery.	Article 6 (1) b) of the GDPR.
Date of purchase/registration	Performing a technical operation.	Section 13/A. (3) of the Elker Act.
IP address at the time of purchase/registration	Performing a technical operation.	

2. The scope of the affected parties:

All data subjects who register/purchase on the website. Neither the username nor the email address is required to contain personal data.

3. Duration of data processing, deadline for data deletion:

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, pursuant to Article 19 of the GDPR, of the erasure of any personal data provided by the data subject. If the data subject's request for erasure also covers the e-mail address provided by him/her, the data controller shall also delete the e-mail address after informing. 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 data subject's contractual data may be deleted upon expiry of the civil law limitation period based on the data subject's request for erasure.

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

4. The potential data controllers authorized to view the data, the recipients of the personal data:

Personal data may be processed by the data controller and its 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, 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 to 21/1 Szent István park, Vácrátót, H-2163
- by e-mail at info@complicense.hu,
- by phone at +36 20 458 9255.

7. Legal basis for data processing:

1. Article 6 (1) b) of the GDPR,

2. Act CVIII of 2001 on certain issues of electronic commerce services and information society services (hereinafter referred to as the Elker Act) Section 13/A (3): *The service provider may process personal data for the purpose of providing the service that are 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 invoices in accordance with accounting legislation, Article 6 (1) c).

4. In the case of claims arising from a contract, the period of limitation is 5 years, according to Section 6:22 of Act V of 2013 on the Civil Code. Section 6:22 [Limitation] (1) *Unless otherwise provided in this Act, claims shall expire after 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 excluding limitation shall be null and void.*

8. We inform you that

- data processing is necessary for the performance of the contract and the provision of an offer.
- You are required to provide your personal data so that we can fulfill your order.
- Failure to provide data will result in us being unable to process your order.

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: Identifying users, tracking visitors, and ensuring customized operation.

5. Duration of data processing, deadline for data deletion:

Cookie type	Legal basis for data processing	Duration of data processing
Session cookies, or other cookies that are essential for the website to function	No data processing is performed using cookies.	The period until the relevant visitor session is closed, i.e. it remains on the computer only until the browser is closed.
Statistical, marketing cookies	Article 6 (1) a) of the GDPR	Data processing lasts for 1 day – 2 years, in accordance with the cookie policy, or until the data subject withdraws their consent.

6. Potential data controllers authorized to access the data: The data controller may access the personal data.

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

8. 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:

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

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

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

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

Using Google Ads conversion tracking

1. The data controller uses the online advertising program called “Google Ads” and, within its 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”).
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 cannot be identified 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 – is used to generate conversion statistics for Ads customers who have opted for conversion tracking. This allows customers to see the number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information that could be used to identify any individual user.
6. If you do not wish to participate in conversion tracking, you can refuse this by disabling the installation of cookies in your browser. You will then not be included in the conversion tracking statistics.
7. Based on Google Consent Mode v2, Google also uses two new cookie types: `ad_user_data` and `ad_personalization`, which are based on the consent of the data subject and which relate to the use and sharing of data. `ad_user_data` is used to provide consent for the use of user data by Google for advertising purposes. `ad_personalization` controls whether the data can be used to personalize ads (e.g. remarketing). The data controller ensures the acquisition and withdrawal of appropriate consents on the cookie banner / panel. Withdrawal of consent does not affect the lawfulness of data processing based on consent before withdrawal.
8. Further information and Google’s privacy statement can be found on the following page: <https://policies.google.com/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 the cookie about the website used by the User is usually transmitted to and stored on a Google server in the USA. 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. The full IP address will only be transmitted to a Google server in the USA 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 will not be merged with other data held by Google. The User can prevent the storage of cookies by setting their browser accordingly, but please note that in this case not all functions of this website may be fully usable. You can also prevent Google from collecting and processing the data generated by cookies 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://tools.google.com/dlpage/gaoptout?hl=hu>

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 mailings 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 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	Purpose of data processing	Legal basis
Name, email address.	Identification, enabling subscription to newsletter/promotional coupons.	Consent of the data subject, Article 6 (1) a). Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities, Section 6 (5).
Date of subscription	Performing a technical operation.	
IP address at the time of registration	Performing a technical operation.	

5. **Data subjects:** All data subjects who subscribe to the newsletter.

6. **The purpose of data processing** is to send electronic messages (e-mail, SMS, push message) containing advertising to the data subject, to provide information about current information, products, promotions, new features, etc.

7. **Duration of data management, deadline for data deletion:** Data management lasts until consent is withdrawn (unsubscribe, deletion request by the data subject), or until the newsletter is terminated.

8. **The potential data controllers authorized to view the data, the recipients of the 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, rectification, erasure or restriction of processing of personal data concerning him or her, and
- you can 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 can request access to, deletion, modification or restriction of processing of personal data, data portability or objection in the following ways:

- by post to 21/1 Szent István park, Vácrátót, H-2163
- by e-mail at info@complicense.hu,
- by phone at +36 20 458 9255.

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

12. We inform you that

- Data processing is based on your consent.
- You are required to provide personal data if you want to receive a newsletter from us.
- Failure to provide data will result in us not being able to send you a newsletter.
- You can withdraw your consent at any time by clicking unsubscribe.
- The withdrawal of consent does not affect the lawfulness of data processing based on consent prior to its 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, contacts.	Article 6 (1) c). (the relevant legal obligation: Act CLV of 1997 on Consumer Protection, Section 17/A (7))
Email address	Contacts	
Phone number	Contacts	
Billing name and address	Identification and handling of quality complaints, questions and problems arising in connection with ordered products/services.	

2. **Scope of the affected parties:** All those who purchase on the website and have quality complaints or complaints.
3. **Duration of data processing, deadline for data deletion:** The minutes, transcript and copies of the response to the objection must be kept for 3 years pursuant to Section 17/A. (7) of Act CLV of 1997 on Consumer Protection.
4. **The potential data controllers authorized to view the data, the recipients of the personal data:** Personal data may be processed by the data controller and its 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, 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 to 21/1 Szent István park, Vácrátót, H-2163,
 - by e-mail at info@complicense.hu,
 - by phone at +36 20 458 9255.
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 required** to provide your personal data so that we can handle your complaint.
 - Failure to provide data will result in us being unable to handle your complaint.

Recipients to whom personal data is disclosed

„*consignee*”: the natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether a third party or not.

1. Data processors (those who process data on behalf of the data controller)

The data controller uses data processors to facilitate its own data processing activities and to fulfill its contractual and legal obligations with the data subject. The data controller places great emphasis on using only data processors who provide adequate guarantees to ensure that the data processing complies with the requirements of the GDPR and that the rights of the data subjects are protected, and to implement appropriate technical and organizational measures. 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 covered by this policy only in accordance with the instructions of the data controller. The data controller is legally liable for the activities of the data processor. The data processor is only liable for damage caused by data processing if it has not complied with the obligations expressly incumbent on data processors set out in the GDPR, or if it has ignored or acted contrary to the lawful instructions of the data controller. The data processor has no substantive decision-making power regarding the processing of the data. The data controller may use a hosting service provider to provide the IT background and a courier service to deliver the ordered products as a data processor.

2. Some data processors

Data processing activity	Name, address, contact information
Hosting service	<p>Tárhely.Eu Kft.</p> <p>Address: 12-14. krt. Könyves Kálmán, Budapest, H-1097</p> <p>Postal code: 510. Mailbox, Budapest H-1538</p> <p>Phone.: +36 1 789 2 789</p> <p>Fax: +36 1 789 3 789</p> <p>Email: support@tarhely.eu</p> <p>Web: www.tarhely.eu</p>

„third party”: the natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct control of the controller or processor, are authorised to process personal data.

3. Data transfer to third parties

Third-party data controllers process the personal data we provide in their own name and in accordance with their own data protection policies.

Data controller's activities	Name, address, contact information
Web development	Rocketboy Kft. Address: 85. str. Bécsi, Budapest, H-1036 Phone.: +36 20 465 3230 E-mail: hello@rocketboy.hu

Social media

1. The fact of data collection, the scope of data processed: the user's registered name on social media sites such as X / Pinterest / Youtube / Instagram / TikTok / LinkedIn, etc., and their public profile picture.
2. Scope of data subjects: All data subjects who have registered on social media sites such as X / Pinterest / Youtube / Instagram / TikTok / LinkedIn, etc., and have "liked" the Service Provider's social media site, or have contacted the data controller through 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 management, deadline for data deletion, possible data controllers authorized to view the data and description of the data subjects' rights 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, method of data management and the possibilities for data deletion and modification are subject to the regulations of the given social media site.
5. Legal basis for data processing: the data subject's voluntary consent to the processing of their personal data on social media sites.

Facebook / Meta joint data management

The Data Controller has a Facebook / Meta profile for the activity. The data processing for statistical purposes implemented on the Facebook social network is the joint data processing of the Data Controller and Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, D2 Dublin Ireland). The data controller appendix of the Facebook Page Analytics function provides detailed information on the details of the joint data processing agreement. The appendix is available at the following link: https://hu-hu.facebook.com/legal/terms/page_controller_addendum

The Data Controller communicates in private messages on the social network only if you contact us there.

1. Categories of stakeholders

- the data subject who registered on the social network and “liked” the Data Controller’s profile page,
- the data subject who contacts the Data Controller in a private message on the social network.

2. Purpose of data processing

The purpose of data management is to share and promote the data controller’s activities and services on the Facebook social network. The Data Controller may use the data provided by the data subject in a private message to respond to the message; otherwise, the Data Controller does not collect data through the social network or extract data from it.

3. Legal basis for data processing

Data processing is based on Article 6 (1) a) of the GDPR, the legal basis for data processing is the data subject’s consent to the processing of their personal data on the Facebook social network.

4. Scope of processed data

- registered name of the person concerned,
- public profile picture of the affected user
- other public data provided and shared by the data subject on the social network

5. Source of the processed personal data:

The source of the processed data is the data subject.

6. Withdrawal of consent:

You can withdraw your consent to data processing at any time, delete your post or comment. Data processing takes place through social media sites operated by a third party. If you withdraw your consent, the Data Controller will delete the conversation with you. Withdrawal of consent does not affect the lawfulness of data processing based on consent prior to withdrawal. The data subject can request access to, deletion, modification or restriction of processing of personal data, and data portability in the following ways:

- by post to 21/1 Szent István park, Vácrátót, H-2163
- by e-mail at info@complicense.hu,
- by phone at +36 20 458 9255.

7. Duration of data processing

- until the data subject withdraws their consent,
- if there is an exchange of messages, then 2 years.

8. Transfer of personal data, recipients and categories of recipients:

For the concept of recipient, see: Article 4, point 9 of the GDPR. The Data Controller shall only transfer the Data Subject's personal data to state bodies and authorities – in particular courts, prosecutors' offices, investigative authorities and misdemeanor authorities, and the National Authority for Data Protection and Freedom of Information – in exceptional cases and on the basis of a legal obligation.

9. Possible consequences of failure to provide data

In the event of failure to provide data, the data subject will not be able to find out about the Data Controller's activities and services via the Facebook social network, or send a message to the Data Controller via Facebook Messenger.

10. Automated decision-making (also known as profiling):

During data processing, automated decision-making, including profiling, is not used.

11. Joint data controller agreement with Facebook Ireland Ltd.:

The Page Analytics feature displays aggregated data that provides insight into how data subjects use the Facebook Page. Facebook Ireland Limited ("Facebook Ireland") and the Controller are joint controllers for the processing of analytics data. The Page Analytics Addendum sets out Facebook's responsibilities and the Controller's responsibilities for the processing of analytics data. Facebook Ireland assumes primary responsibility for the processing of analytics data under the GDPR and for complying with all relevant obligations under the GDPR in relation to the processing of analytics data. Facebook Ireland also makes an extract of the Page Analytics Addendum available to all data subjects. The Controller

ensures that it has an appropriate legal basis for processing analytics data under the GDPR, identifies the controller of the Page, and complies with any other applicable legal obligations. Facebook Ireland is solely responsible for the processing of personal data in connection with the Page Analytics feature, except for data falling within the scope of the Page Analytics Addendum. The Site Analytics Addendum does not grant the Controller the right to request personal data of Facebook users that Facebook Ireland processes in connection with Facebook, including Site Analytics data. The Controller may not act on behalf of Facebook Ireland in responding to data protection requests or respond to them.

Customer relations and other data processing

1. If the data controller has any questions or problems while using our services, the data subject can contact the data controller via the methods provided on the website (telephone, e-mail, social media, etc.).
2. The data controller collects the received e-mails, messages, data provided by telephone, Meta, etc., together with the name and e-mail address of the interested party, as well as other voluntarily provided personal data, az adatközléstől számított legfeljebb 2 év elteltével törli.
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 legal authorization, the Service Provider is obliged to provide information, communicate and transfer data, or make documents 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. The 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. The 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 of time that allows the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the data and instead request the restriction of its use;
- 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 processing; in this case, the restriction applies for a period of time until it is determined whether the legitimate grounds of the data controller override your legitimate grounds.

6. The right to data portability

You have the right to receive the personal data concerning you, which you have provided to a data controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which you have provided the personal data.

7. The right to protest

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:

- Necessary for the conclusion or performance of a contract between you and the data controller;
- Is permitted by Union or Member State law applicable to the controller, which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- It is based on your express consent.

Deadline for action

The controller shall inform you without undue delay, but in any case within 1 month of receipt of the request, of the measures taken in response to the above requests. If necessary, this may be **extended by 2 months**. The controller shall inform you of the extension of the deadline, indicating the reasons for the delay, **within 1 month** of receipt of the request. If the controller does not take action in response to your request, **it shall inform you without undue delay, but at the latest within one month 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 data security appropriate to the risk, taking into account the state of the art 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, including, where appropriate:

1. pseudonymization 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 restore access to and availability of personal data in a timely manner in the event of a physical or technical incident;
4. a procedure for regularly testing, assessing and evaluating the effectiveness of 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, this can be done by establishing a physical storage and archiving system, and in the case of data processed in electronic form, by using a central authorization management system.
6. The method of storing data using IT methods must be chosen in such a way that their deletion – taking into account any possible different deletion deadline – can be carried out upon expiry of the data deletion deadline or if necessary for other reasons. The deletion must be irreversible.
7. Paper-based data carriers must be stripped of personal data using a document shredder or by using an external organization specializing 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 securely and irretrievably deleted in advance.
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 safe, lockable, dry room.
2. If personal data managed on paper is digitized, the rules governing digitally stored documents must 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 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. The computers and mobile devices (other data carriers) used during data processing 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. To ensure the security of digitally stored data, the Service Provider uses data backups and archiving.
4. The central server machine can only be accessed by persons with appropriate authorization and designated for that purpose.
5. Data on computers can only be accessed with a username and password.

Informing the data subject about the data protection incident

Where the personal data breach is likely to result in 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 state in a clear and intelligible manner the nature of the personal data breach and 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 personal data breach; describe the measures taken or planned by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences resulting from the personal data breach. The data subject shall not be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organizational security measures and these measures have been applied to the data affected by the data breach, in particular measures – such as the use of encryption – that make the data unintelligible to persons not authorised to access the personal 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 no longer likely to materialise;

- **the provision of information would require a disproportionate effort.** In such cases, the data subjects shall be informed by means of publicly published information or a similar measure shall be taken which ensures 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 controller shall notify the personal data breach to the supervisory authority competent pursuant to Article 55 without undue delay and, where feasible, not later than 72 hours after having become aware of the personal data breach, 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 specified 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 processed 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 data controller shall document the circumstances and results of this review, retain this documentation for ten years after the review and make it available to the National Data Protection and Freedom of Information Authority (hereinafter: 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

9-11. str Falk Miksa, Budapest, H-1055

Mailing address: Pf. 9., Budapest, H-1363

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:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (General Data Protection Regulation) (GDPR);
- Act CXII of 2011 – on the right to informational self-determination and freedom of information (hereinafter: the 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 – on the prohibition of unfair commercial practices against consumers;
- Act XLVIII of 2008 – on the basic conditions and certain limitations of economic advertising activities (especially Section 6);
- Act XC of 2005 on Electronic Freedom of Information;
- Act C of 2003 on Electronic Communications (specifically Section 155);
- Opinion No 16/2011 on the EASA/IA Recommendation on best practices in online behavioural advertising;
- Recommendation of the National Data Protection and Freedom of Information Authority on the data protection requirements for prior information.