

PRIVACY POLICY

OF THE

AIRSOFT ARENA HUNGARY

KORLÁTOLT FELELŐSSÉGŰ

TÁRSASÁG

„THE LONGEST DAY 4”



2024. 01. 01.

INTRODUCTION

Airsoft Arena Hungary Korlátolt Felelősségű Társaság (hereinafter: **Data Controller**) considers it of utmost importance to respect the right of information self-determination of its partners, customers and visitors. The Data Controller organizes airsoft events and events ("games") as part of its main activity. As part of this, it manages personal data in relation to a number of business and operational processes. These processes have been examined and audited by the Data Controller, and their compliance is continuously updated. The Data Controller processes personal data confidentially, in accordance with applicable European Union and domestic legislation, as well as relevant data protection (authority) practice, and takes all security and organizational measures that guarantee the security, confidentiality, integrity and availability of the data.

Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 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 Directive 95/46/EC (the hereinafter: GDPR), and CXII of 2011 on the right to information self-determination and freedom of information. Act (hereinafter: Infotv.) publishes the following policy (hereinafter: Privacy Policy) in order to protect the processed personal data.

This Privacy Policy is available at the Data Controller's headquarters, site, website, and social media platforms, as well as at the location of individual events.

The Privacy Policy is effective from January 1, 2024 until withdrawn, with regard to the processing of the personal data of the persons involved in the events organized by the Data Controller ("game").

The Data Controller reserves the right to unilaterally change this Privacy Policy at any time. If the Privacy Policy is amended, the Data Controller will inform the affected parties accordingly.

Budapest, 2024. 01. 01.

THE DATA CONTROLLER

Name of Data Controller: Airsoft Arena Hungary Korlátolt Felelősségű Társaság
Registered office: 1121 Budapest, Mese köz 3. fszt. 1.
Location: 1165 Budapest, Margit utca 114. 33. ép.
(Ikarus Park, 33-as épület)
Tax number: 27410378-2-43
Company registration number: 01-09-388974
E-mail: airsoftarena@gmail.com
Represented by: Zsolt Okrutay managing director

Name of DPO: Dr. Krisztián Antal LL.M. (Twenty-One Consulting Kft.)
Abbreviated name: Twenty-One Consulting Kft.
Registered office: 1132 Budapest, Váci út 50. 1. em. 8. ajtó
Tax number: 29190801-2-41
Company registration number: 01-09-382820
Represented by: Dr. Krisztián Antal managing director
E-mail: info@21consulting.hu
Activities performed: Data protection officer service

PROCESSING IN CONNECTION WITH THE REGISTRATION

As a result of the Data Controller's main activity, it organizes events ("games"), in the framework of which it manages personal data in connection with the registration of visitors to the events and booking of appointments. Registration and booking an appointment (registration for a game) is possible at the Data Controller's headquarters and location, as well as on the website <https://airsoftarena.hu/aleghosszabbnap/#>. The Data Controller strives to process only the personal data necessary for the successful completion of the registration. The Data Controller processes the personal data obtained in connection with the registration as follows:

Personal data processed: surname and first name, title, e-mail address, telephone number, whether the person concerned has reached the age of 18, the place and time of the event.

Categories of data subjects: data subjects applying for the organized event.

The source of the personal data processed: the data subject.

Purpose of data processing: prior consultation, prior registration for an event, as well as prior verification of the age of 18.

Legal basis for processing: Pursuant to Article 6 (1) (b) of the GDPR, taking steps between the Data Controller and the data subject prior to the conclusion of the contract and performing the contract in connection with the transfer and acceptance arising in the main activity of the Data Controller.

In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: 5 years after the existence of the contractual or business relationship or the status of the representative concerned (general limitation period for enforcement). Upon expiry of the general limitation period available for enforcement or the longer retention period prescribed by law, personal data, including contact details, shall be deleted immediately and irrevocably. Exceptions to this are possible enforcement of rights or claims, proceedings before a court, prosecutor's office, investigating authority, infringement authority, administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties unless otherwise provided in the contract between the data subject and the Data Controller, or under the authority of any law or claim, court, public prosecutor's office, investigating authority, misdemeanor authority, administrative authority, national data protection and freedom of information authority, or other bodies authorized by law.

Processing method: the Data Controller shall process the personal data of the data subject manually (on paper) and electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights of access, rectification, erasure, restriction of data processing, data portability and object.

PROCESSING IN CONNECTION WITH PROCEDURE CONDUCTED IN CONNECTION WITH CERTIFICATION OF VIOLATING BEHAVIOR

As a result of the Data Controller's main activity, it organizes events ("games"), which take place in compliance with the strict and unambiguous rules for Airsoft, which are known to the affected parties in advance and continuously. If the data subject violates the relevant general and special (e.g. security) rules, the Data Controller has the right to call on the data subject to comply with the rules, and is also entitled to remove the data subject from the event area. A record will be taken in all cases. The Data Controller processes the personal data obtained in connection with the registration - regardless of the channel of access - as follows:

Personal data processed: first and last name, title, e-mail address, telephone number, address, the circumstances of the rule-breaking behavior, the personal data of other persons involved in the same circle, as well as other personal data arising and required differently in each case.

Categories of data subjects: data subjects participating in the organized event (game).

The source of the personal data processed: the data subject.

Purpose of data processing: determination of rule-breaking behavior, recording of minutes, removal of the rule-breaker from the relevant event.

Legal basis for processing: the legitimate interest of the Data Controller based on point f) of Article 6 (1) of the GDPR. In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: 5 years after the existence of the contractual or business relationship or the status of the representative concerned (general limitation period for enforcement). Upon expiry of the general limitation period available for enforcement or the longer retention period prescribed by law, personal data, including contact details, shall be deleted immediately and irrevocably.

Exceptions to this are possible enforcement of rights or claims, proceedings before a court, prosecutor's office, investigating authority, infringement authority, administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties unless otherwise provided in the contract between the data subject and the Data Controller, or under the authority of any law or claim, court, public prosecutor's office, investigating authority, misdemeanor authority, administrative authority, national data protection and freedom of information authority, or other bodies authorized by law.

Processing method: the Data Controller shall process the personal data of the data subject manually (on paper) and electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights of access, rectification, erasure, restriction of data processing and object.

PROCESSING IN CONNECTION WITH INVOICING

During the issue of invoices arising as part of the main activity of the Data Controller, it processes data as follows:

Personal data processed: first and last name, title, adress.

Categories of data subjects: data subjects in a contractual relationship with the Data Controller (participated in the game).

The source of the personal data processed: the data subject.

Purpose of data processing: invoicing arising within the main activity of the Data Controller.

Legal basis for processing: In connection with the issuing of invoices arising within the scope of the main activity of the Data Controller, on the basis of Article 6 (1) point c) of the GDPR, the Data Controller shall, in the tax law and accounting legislation in force at all times - in particular **VAT Act, Accounting Act.** - fulfillment of your legal obligations.

In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: **8 years**, as well as in the tax law and accounting legislation in force at all times - so in particular VAT Act, No. TV. - specific duration.

Upon expiry of the longer retention period specified by law, personal data - including contact data - will be deleted immediately and irretrievably. Exceptions to this are possible enforcement of rights or claims, proceedings before a court, prosecutor's office, investigating authority, infringement authority, administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: the personal data will be forwarded to a third party audited by the Data Controller in advance, having a contractual relationship with the Data Controller, performing accounting, auditing and tax expert activities for the Data Controller, which data transfer is also included in the data processing agreement between the Data Controller and the third party pursuant to Article 28 (3) of the GDPR confirm.

Also, data may be forwarded to the above in the case of possible legal or claim enforcement, court, prosecutor's office, investigative authority, rule violation authority, public administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies based on the authorization of the law.

Processing method: the Data Controller shall process the personal data of the data subject manually (on paper) and electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights of access, rectification, erasure, restriction of data processing and object.

PROCESSING IN CONNECTION WITH THE CREATION AND PUBLICATION OF IMAGE AND SOUND RECORDINGS

As part of the main activity of the Data Controller, it may make an image and/or sound recording that is/is not a mass recording, or a written summary. According to the main rule, data processing is based on the express consent of the data subject after prior information. The Data Controller strives to manage only the necessary personal data.

With the consent statement of the data subject, for the purpose of introducing and promoting the Data Controller's services; on his website:

Web: <https://airsoftarena.hu/>

Facebook: <https://www.facebook.com/airsoftarena/>

Instagram: <https://instagram.com/airsoftarenabudapest>

Youtube: <https://www.youtube.com/channel/UCi4sFAkhRZmwjXEmatA40Zw>

TikTok: <https://www.tiktok.com/airsoftarena>

can publish news, posts, as well as pictures and/or sound recordings.

During the period of data processing, the data subject may request the deletion of these personal data at any time, and acknowledges that their removal may take place at any time based on the Data Controller's unilateral decision.

The Data Controller processes personal data as follows:

Personal data processed: first and last name, title, nickname, picture recording, picture and sound recording, place of residence.

Categories of data subjects: data subjects in a contractual relationship with the Data Controller (participated in the game).

The source of the personal data processed: the data subject.

Purpose of data processing: publication of images and sound recordings (videos) made as part of the main activity of the Data Controller.

Legal basis for processing: on the basis of Article 6 (1) point a) of the GDPR, express consent of the data subject in accordance with Article 9 (2) point a) of the GDPR.

In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: after the investigation of the declaration to delete personal data sent by the data subject or his representative to the Data Controller - if his request is well-founded - the personal data of the data subject will be deleted immediately and irretrievably. Exceptions to this are video and audio recording classified as mass recording, as well as any legal or claim enforcement, court, prosecutor's office, investigative authority, violation authority, public administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies authorized by law. It is important that the identification of the data subject is not possible in all cases due to the nature of the event and the clothing worn, so there may be cases where the recording is not deleted despite the data subject's express objection, given that the data subject cannot be identified. In each case, the Data Controller examines this during the data subject inquiry and informs the data subject accordingly.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties unless otherwise provided in the contract between the data subject and the Data Controller, or under the authority of any law or claim, court, public prosecutor's office, investigating authority, misdemeanor authority, administrative authority, national data protection and freedom of information authority, or other bodies authorized by law.

Processing method: the Data Controller shall process the personal data of the data subject electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights to withdraw consent, access, rectification, erasure, restriction of data processing, data portability.

More information about social media platforms:

Facebook és Instagram (META): Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The Data Controller is jointly responsible with Facebook for the processing of Insights data on the Facebook fan page. The corresponding agreement according to Article 26 of the GDPR can be found here:

https://www.facebook.com/legal/terms/page_controller_addendum .

For more information about Page Insights:

https://www.facebook.com/legal/terms/information_about_page_insights_data .

The general use of Facebook is at your own risk. Facebook's relevant data processing information can also be found on the Data Controller's Facebook page.

The data subject can edit and object to personalized Facebook advertising wishes at any time in the Facebook settings.

YouTube: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

More information about the personal data collected during Google/YouTube integration can be found in the following data processing information: <https://policies.google.com/privacy?hl=hu>

Opting out is also possible: <https://adssettings.google.com/authenticated>

TikTok: TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland.

More information about personal data collected during TikTok integration can be found in the following data processing information: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>

PROCESSING IN CONNECTION WITH PICTURES TAKEN DURING THE GAME, WITH THE GAME OR WITH ITS THEME, AND WITH IDENTIFICATION CARDS

In connection with the theme of the event or game it organizes, the Data Controller may make an image and/or sound recording that is not a mass recording, or an identification card. According to the main rule, data processing is based on the express consent of the data subject after prior information. The Data Controller strives to manage only the necessary personal data.

During the period of data processing, the data subject may request the deletion of these personal data at any time, and acknowledges that their removal may take place at any time based on the Data Controller's unilateral decision.

The Data Controller processes personal data as follows:

Personal data processed: first and last name, title, nickname, picture recording, picture and sound recording, location, invented random name, identification number, which can only be used within the framework of the game, area of interest (selected page, role).

Categories of data subjects: data subjects in a contractual relationship with the Data Controller (participated in the game).

The source of the personal data processed: the data subject.

Purpose of data processing: arising from the theme of the game organized as part of the main activity of the Data Controller, conducting the game at a high standard and in a way that is as close as possible to authenticity.

Legal basis for processing: on the basis of Article 6 (1) point a) of the GDPR, express consent of the data subject in accordance with Article 9 (2) point a) of the GDPR.

In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: the duration of the game, taking into account that when the game ends the identification card can be kept by the data subject ("take it home as a souvenir"), and after the investigation of the statement to delete the personal data sent by the data subject or his representative to the Data Controller - if his request is justified - the data subject's personal your data - will be deleted immediately and irretrievably. Exceptions to this are video and audio recording classified as mass recording, as well as any legal or claim enforcement, court, prosecutor's office, investigative authority, violation authority, public administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies authorized by law. It is important that the identification of the data subject is not possible in all cases due to the nature of the event and the clothing worn, so there may be cases where the recording is not deleted despite the data subject's express objection, given that the data subject cannot be identified. In each case, the Data Controller examines this during the data subject inquiry and informs the data subject accordingly.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties unless otherwise provided in the contract between the data subject and the Data Controller, or under the authority of any law or claim, court, public prosecutor's office, investigating authority, misdemeanor authority, administrative authority, national data protection and freedom of information authority, or other bodies authorized by law.

Processing method: the Data Controller shall process the personal data of the data subject electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights to withdraw consent, access, rectification, erasure, restriction of data processing, data portability.

PROCESSING IN CONNECTION WITH COMPLAINTS

The Data Controller accepts complaints received in writing (on its website, social media interfaces, by post or e-mail) in connection with the performance of its main activity and the provision of services. As part of this, the Data Controller processes the personal data of the data subject as follows:

Personal data processed: first and last name, title, e-mail address, telephone number, address, other personal data provided by him in connection with the complaint, case number, signature, and in the case of authorized participation, the authorized person's last name and first name, title, place and time of birth, and mother's name.

Categories of data subjects: data subjects who submit a complaint to the Data Controller.

The source of the personal data processed: the data subject.

Purpose of data processing: complaint investigation and remedy.

Legal basis for processing: the legitimate interest of the Data Controller based on point f) of Article 6 (1) of the GDPR. In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: remedying a complaint, at most the time for asserting a claim (general limitation period of 5 years). Exceptions to this are possible enforcement of rights or claims, proceedings before a court, prosecutor's office, investigating authority, infringement authority, administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties unless otherwise provided in the contract between the data subject and the Data Controller, or under the authority of any law or claim, court, public prosecutor's office, investigating authority, misdemeanor authority, administrative authority, national data protection and freedom of information authority, or other bodies authorized by law.

Processing method: the Data Controller shall process the personal data of the data subject manually (on paper) and electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights of access, rectification, erasure, restriction of data processing and object.

PROCESSING IN CONNECTION WITH REQUESTS AND SUGGESTIONS

The Data Controller accepts inquiries and suggestions received in writing (on its website, by post or e-mail) in connection with the performance of its main activity and the continuous development of its service. Within this framework, the Data Controller processes the personal data of the data subject as follows:

Personal data processed: first and last name, title, e-mail address, telephone number, address, other personal data provided by him or her, signature.

Categories of data subjects: data subjects who submit opinions, suggestions, and comments to the Data Controller.

The source of the personal data processed: the data subject.

Purpose of data processing: service development, contact.

Legal basis for processing: the legitimate interest of the Data Controller based on point f) of Article 6 (1) of the GDPR. In the exercise of a right or claim and in the processing of contact details of legal persons, the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: 5 years general limitation period. Exceptions to this are possible enforcement of rights or claims, proceedings before a court, prosecutor's office, investigating authority, infringement authority, administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies.

Access: the processed personal data is primarily accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties unless otherwise provided in the contract between the data subject and the Data Controller, or under the authority of any law or claim, court, public prosecutor's office, investigating authority, misdemeanor authority, administrative authority, national data protection and freedom of information authority, or other bodies authorized by law.

Processing method: the Data Controller shall process the personal data of the data subject manually (on paper) and electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights of access, rectification, erasure, restriction of data processing and object.

INFORMATION ON THE USE OF COOKIES

In accordance with the common practice, the Data Controller also uses cookies on the website. Cookies alone are not suitable for identifying the user.

Cookies are short data files that are placed on a user's computer by the website you are visiting.

The purpose of cookies is to ensure the continuous operation of the given infocommunication and Internet service, to facilitate, make it more convenient and to contribute to the further development of the website with anonymous statistics.

The purpose of cookies is to ensure the continuous operation of the given infocommunication and Internet service, to facilitate, make it more convenient and to contribute to the further development of the website with anonymous statistics. Without the use of cookies, the smooth use of the website cannot be guaranteed.

You can check the type of cookies used by the Data Controller's website at <https://www.cookieserve.com/>

Browser settings

Acceptance and authorization of the use of cookies is not mandatory. You can reset your browser settings to reject all cookies or to indicate if a cookie is being sent, but some features or services may not work properly without cookies. Most browsers automatically accept cookies by default, but you can usually change them to prevent them from being accepted automatically.

The setting options are usually in the "Options" or "Settings" menu of the browser, it is recommended to use the "Help" menu of the search engine for the settings that best suit the person concerned.

Personal data processed: the online ID (IP address) of users who visit the website, as well as other personal information generated in connection with browsing (browsing time, browser type, some characteristics of the operating system of the device used to browse; such as operating system type and language set).

Categories of data subjects: visitors to the Data Controller's website.

The source of the personal data processed: the Data Subject.

Purpose of data processing: The Data Controller operates a complex internal security system and performs control activities, which involve the management of data related to the use of cookies, in order to operate the Website securely and to effectively combat and overload attacks that cause the unavailability of the Website's services.

Legal basis for processing: the Data Controller has a legitimate interest pursuant to Article 6 (1) (f) of the GDPR.

Duration of data processing: duration of the visit.

Access: the processed personal data is accessed by the Data Controller.

Transmission: personal data will not be transferred to third parties.

Processing method: the Data Controller shall process the personal data of the data subject electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights of access, rectification, erasure, restriction of data processing and protest.

DATA PROCESSING ON THE WEBSITE

The Data Controller informs the data subject that it uses Google Analytics, which has built the appropriate code into its own page, to measure the total number of services and sub-pages available under its domain name and to compile statistics on its visitors.

The referenced programs on the user's computer are called cookies are placed that collect user data. Visitors to the Website (Users) allow the Data Controller to use Google Analytics.

They also consent to the Data Controller's monitoring and follow-up of their user behavior and the use of all services provided by the programs.

In addition, the user has the option to disable the recording and storage of cookies for future reference at any time.

Data subjects can find privacy information about Google Analytics settings and usage on the Google website. https://policies.google.com/privacy?hl=en_US

Google reports that Google Analytics uses a number of first-party cookies to report visitor interactions on your site. These cookies only store non-personally identifiable information.

Browsers do not share their own cookies between domains. You can find more information about cookies in the Google Advertising and Privacy FAQ.

Google Analytics: The Data Controller uses Google Analytics primarily to generate statistics for, among other things, the performance of your website's campaigns. Using the program, the Data Controller mainly obtains information about how many visitors visited your Website and how much time the 3 visitors spent on the Website.

The program recognizes the visitor's IP address, so you can track whether the visitor is returning or a new visitor, and how the visitor has traveled to the Website and where they have entered.

Personal data processed: IP address, clicks.

Categories of data subjects: visitors to the Data Controller's website.

The source of the personal data processed: the Data Subject.

Purpose of data processing: promoting the Data Controller's website and services, measuring traffic.

Legal basis for processing: the consent of the data subject under Article 6(1)(a) of the GDPR.

Duration of data processing: 30 days.

Access: **Google may access your personal information.**

Transmission: the personal data of the data subjects are not transferred by the Data Controller.

Processing method: the Data Controller shall process the personal data of the data subject electronically.

Profiling: the Data Controller does not make a decision based solely on automated processing in connection with the data subject and does not profile the data subject on the basis of the personal data available.

Rights of the data subject: in the context of data processing, data subjects may exercise the rights to withdraw consent, access, rectification, erasure, restriction of data processing, data portability.

PROCESSING OF SPECIAL CLASSIFIED DATA ACCORDING TO ARTICLE 9 (1) GDPR

The Data Controller does not request special data from the data subject (racial or ethnic origin, political opinion, religious or worldview beliefs, trade union membership, as well as data on health or sex life), so the Data Controller does not ask the data subject to provide such data, even by letter, neither on the phone nor in person.

Special data may be provided in a job application, complaint, or comment submitted by the data subject to the Data Controller, but in this case, the data is also subject to the data subject's voluntary decision, i.e. it is not mandatory.

If the data subject nevertheless decides that for some reason he considers it important to provide detailed information and thus special personal data to the Data Controller, in that case the legal basis for data processing is the consent given by the data subject after prior information pursuant to Article 6 (1) paragraph a) of the GDPR. based on the provisions of Article 9, Paragraph 2, Point a) of the GDPR.

If, despite the above, the data subject provides special data to the Data Controller, the Data Controller will in all cases return the original document containing such data to the data subject, and will not make a copy of it. An exception to this is if the data subject sends a letter and informs the Data Controller of the special data in the body of the letter.

DATA SECURITY

The Data Controller and the data processors are entitled to get acquainted with the personal data of the data subject to the extent necessary for the performance of the tasks falling exclusively and exclusively within their area of responsibility.

In the interest of data security, the Data Controller assesses and records all data processing activities performed by him.

Based on the record of data processing activities, the Data Controller performs a risk analysis in order to assess the conditions under which each data processing is carried out and which risk factors may cause harm and possible data protection incidents during the data processing. The risk analysis should be performed on the basis of the actual data processing activity. The purpose of the risk analysis is to define security rules as well as measures that effectively ensure the adequate protection of personal data in line with the performance of the Data Controller's activity.

The Data Controller shall take appropriate technical and organizational measures to ensure and demonstrate that the processing of personal data is in accordance with the GDPR, taking into account the nature, scope, circumstances, and purposes of the processing and the varying probability and severity of the risk to the rights and freedoms of natural persons. Including, where appropriate:

- pseudonymization and encryption of personal data;
- ensuring the continued confidentiality, integrity, availability, and resilience of the systems and services used to process personal data;
- in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;
- a procedure for regular testing, assessment, and evaluation of the effectiveness of the technical and organizational measures taken to ensure the security of data processing.

In determining the appropriate level of security, explicit account shall be taken of the risks arising from the processing, in particular arising from the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data that have been transmitted, stored or otherwise processed.

The Data Controller shall implement appropriate technical and organizational measures to ensure that, by default, only personal data that are necessary for the specific data processing purpose are processed. This obligation applies to the amount of personal data collected, the extent to which they are processed, the duration of their storage, and their availability. In particular, these measures should ensure that, by default, personal data cannot be made available to an indefinite number of persons without the intervention of a natural person.

In the event of personal data damage or destruction, attempts should be made to replace the damaged data as far as possible from other available data sources. The replaced data must indicate the fact of the replacement.

Data Controller protects your internal network with multi-level firewall protection. In all cases, a hardware firewall (border protection device) is located at the entry points of the applied public networks. The Data Controller stores the data redundantly - ie in several places - in order to protect it from destruction, loss, damage or illegal destruction due to the failure of the IT device. It protects your internal networks from external attacks with multi-level, active protection against complex malicious code (eg virus protection).

The Data Controller will do everything with the utmost care to ensure that its IT tools and software continuously comply with the technological solutions generally accepted in the operation of the market.

DATA SUBJECT'S RIGHTS IN RELATION TO DATA PROCESSING

It is important for the Data Controller that his data processing meets the requirements of fairness, legality, and transparency. In connection with data processing, the data subject may at any time:

- request information on data processing and access to data processed concerning it,
- in the event of inaccurate data, request its correction or completion,
- request the deletion of data processed under his consent,
- object to the processing of your data,
- request a restriction on data processing.

Upon request for information, if it is not subject to restrictions in the interest specified by law, you can find out whether the processing of your personal data is in progress with the Data Controller and is entitled to receive information about the data processed concerning him/her:

- the purpose for which it is treated,
- what authorizes the processing of the data (on its legal basis),
- when and for how long they process their data (duration),
- what data he processes and makes a copy available to the data subject,
- the recipients of the personal data or the categories of recipients,
- transfers to a third country or to an international organization,
- if they were not collected from the data subject, the source of the data,
- the characteristics of automated decision-making, if used by the controller,
- the data subject's rights in relation to data processing,
- redress.

The Data Controller shall respond to requests for information and access within 25 days at the latest. The Data Controller may charge a reasonable fee based on administrative costs for additional copies of the personal data processed about the data subject.

When requesting the correction (modification) of the data, the data subject must prove the reality of the data requested to be modified and must also prove that the person entitled to do so requests the modification of the data. This is the only way for the Data Controller to judge whether the new data is real and, if so, whether to modify the old one.

If it is not clear whether the processed data is correct or accurate, the Data Controller does not correct the data, only marks it, ie indicates that it has been objected to by the data subject, but it may not be incorrect. After confirming the authenticity of the request, the data controller shall, without undue delay, correct the inaccurate personal data or supplement the data affected by the request. The Data Controller shall notify the data subject of the correction or marking.

In case of requesting the deletion or blocking of the data, the data subject may request the deletion of his / her data, which means that the Data Controller is obliged to delete the data concerning the data subject without undue delay, if:

- personal data have been processed unlawfully
- personal data are no longer required for the purpose for which they were processed,
- if the processing was based on the data subject's consent and was withdrawn and another legal basis does not justify further processing of the data,
- the legislation requiring the Data Controller to delete the data imposes such an obligation and has not yet complied with it.

You can request a data processing restriction, which the data controller complies with if one of the following is met:

- the data subject disputes the accuracy of the personal data, in which case the restriction shall apply for a period which allows the controller to verify the accuracy of the personal data,
- the processing is unlawful and the data subject opposes the deletion of the data and instead requests that their use be restricted,
- the controller no longer needs the personal data for the purpose of data processing, but the data subject requests them in order to make, enforce or protect legal claims; or against data processing concerning him.

Where data are restricted, such personal data may be processed, with the exception of storage, only with the consent of the data subject or for the purpose of bringing, enforcing or protecting legal claims or protecting the rights of another natural or legal person or in the important public interest of the

Union or a Member State. The Data Controller shall inform the data subject in advance of the lifting of the restriction of data processing.

If the data subject considers that the data processing is in accordance with GDPR or Infotv. If you violate the provisions of the Data Protection Act or consider it infringing the way the Data Controller processes your personal data, we recommend that you first contact the Data Controller with your complaint. Your complaint will be investigated in all cases.

Despite your complaint, you continue to complain about the way the Data Controller processes your data or would like to contact an authority directly, you can file a complaint with the National Data Protection and Freedom of Information Authority (address: 1055 Budapest, Falk Miksa utca 9-11., Postal address: 1363 Budapest, Pf. 9. E-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu).

You have the option of going to court to protect your data, which will act out of turn in the case. In this case, you are free to decide whether to bring an action before the court of your place of residence (permanent address) or your place of residence (temporary address) (<http://birosag.hu/torvenyszekek>). You can find the court of your place of residence or stay at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

Annex 1.

Relevant legislation

In developing the Privacy Policy, the Data Controller has taken into account the relevant existing legislation and major international recommendations, in particular:

- Regulation (EU) No 2016/679/EU 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 Directive 95/46/EC (GDPR);
- Act CXII of 2011 on the right to information self-determination and freedom of information;
- Civil Code Act V of 2013 (Ptk.);
- Act CXXX of 2016 on the Code of Civil Proceedings (Pp).
- Law C of 2000 on accounting (Szám.tv)
- The Value Added Tax Act 2007 CXXVII (VAT TV.)

Definitions relating to the processing of personal data

- controller: the legal entity which defines the purposes and means of processing personal data;
- "processing" means any operation or set of operations carried out on personal data or files by automated or non-automated means, such as collection, recording, ordering, articulation, storage, transformation or alteration, querying, inspection, use, communication, transmission, dissemination or otherwise making available, coordination or interconnection, restriction, erasure or destruction;
- transmission: making the data available to a specific third party;
- data wipe: rendering data unrecognizable in such a way that it is no longer possible to recover them;
- 'data marking' means the identification of the data with a view to distinguishing it;
- limitation of processing: indication of the personal data stored with a view to limiting their future processing;
- data destruction: complete physical destruction of the data medium;
- processor: the legal person who processes personal data on behalf of the controller;
- recipient: the natural or legal person, public authority, agency or any other body with whom the personal data is communicated, whether or not it is a third party;
- concerned: an identified or identifiable natural person; identify a natural person who can be identified directly or indirectly, in particular by means of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person;
- "third party" means any natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or persons authorised to process personal data under the direct direction of the controller or processor;
- consent of the data subject: a voluntary, specific and informed and unambiguous statement of the data subject's will to indicate, by means of a statement or an unmistakably expressive act of confirmation, that he or she consents to the processing of personal data concerning him;
- personal data: any information relating to the data subject;
- objection: a statement by the data subject objecting to the processing of his or her personal data and requesting the termination of the processing or the deletion of the data processed.

Annex 3.

The names and details of the processors can be accessed by clicking here.

Name of data processor:	Czinege – Lilla Vincze egyéni vállalkozó
Registered office:	6521 Vaskút, Kiss Ernő utca 23.
Tax number:	59392130-1-23
E-mail:	info@villamoldal.hu
Activities performed:	Website operation and development
Name of data processor:	Websupport Magyarország Korlátolt Felelősségű Társaság
Abbreviated name:	Websupport Magyarország Kft.
Registered office:	1132 Budapest, Victor Hugo utca 18-22.
Tax number:	25138205-2-41
Company registration number:	01-09-381419
Represented by:	András Sűdy managing director
E-mail:	info@tarhelypark.hu
Activities performed:	Hosting service
Name of data processor:	KBOSS.hu Kereskedelmi és Szolgáltató Kft. (Szamlazz.hu)
Abbreviated name:	KBOSS.hu Kft.
Registered office:	1031 Budapest, Záhony utca 7.
Tax number:	13421739-2-41
Company registration number:	01-09-303201
Represented by:	Balázs Ángyán managing director
E-mail:	info@szamlazz.hu
Activities performed:	Billing service