

## PRIVACY NOTICE

*Effective as of 19 September 2025*

The Controller is committed to protecting and safeguarding your personal data. The information on the processing of your personal data is provided in this Privacy Notice (**Privacy Notice**). This Privacy Notice provides a summary of what personal data and how are processed and used by the Controller and how the Controller protects such data in relation to your browsing of the website and the use of the services available on the website.

Furthermore, this Privacy Notice also applies to data processing by the Controller in connection with the official social media platforms.

**What are personal data?** Personal data means any **information** or partial information **relating to you as a natural person**, on the basis of which you can be directly (e.g. based on your name) or indirectly (e.g. through a personal unique identifier) identified. Your personal data include details such as: your first name and surname, home address, email address or phone number.

*This Notice is provided pursuant to Articles 13 and 14 of 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 Directive 95/46/EC (GDPR).*

### CONTROLLER'S NAME AND CONTACT DETAILS

Name: **Webgarden IT and Design Services Korlátolt Felelősségű Társaság [Webgarden IT and Design Services Limited Liability Company]**

Registered office: H-1142 Budapest, Szőnyi út 33/A, Hungary

Company registration number: 01-09-448393

Tax number: 32897560-2-42

Registered and kept on record by: Company Registry Court of Budapest-Capital Regional Court

Email: [office@webgarden.eu](mailto:office@webgarden.eu)

Website: [www.webgarden.eu](http://www.webgarden.eu)

Webgarden IT and Design Services Korlátolt Felelősségű Társaság is hereinafter referred to as '**Controller**'.

### **Name, address and contact details of the hosting service provider:**

Name: **Webgarden IT and Design Services Korlátolt Felelősségű Társaság**

Registered office: H-1142 Budapest, Szőnyi út 33/A, Hungary

Email: [office@webgarden.eu](mailto:office@webgarden.eu)

Website: [www.webgarden.eu](http://www.webgarden.eu)

### DATA PROTECTION MANAGER'S NAME AND CONTACT DETAILS

In accordance with the provisions of the GDPR, the Controller did not appoint a data protection officer.

○ **If you have any question or comment in relation to data processing or wish to exercise your rights, you can do so using the following contact details:** by email via [office@webgarden.eu](mailto:office@webgarden.eu), and by post to the address H-1142 Budapest, Szőnyi út 33/A, Hungary .

### ACCEPTANCE OF THE PRIVACY NOTICE

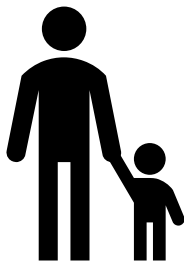
If you use the [www.webgarden.eu](http://www.webgarden.eu) website or any of the other websites or social media sites specified in this Privacy Notice (hereinafter jointly referred to as: '**website**'), or check the checkbox for having read the Privacy Notice, you confirm that you have fully read, become aware of and understood the content of this Privacy Notice,

and you accept the data processing performed in accordance with this Privacy Notice. **If you do not agree with the provisions of this Privacy Notice, please do not use the website!**

## AMENDMENT OF THE PRIVACY NOTICE

The Controller reserves the right to unilaterally amend this Privacy Notice. Should the scope of services offered by the Controller expand in the future, so that the introduction of new services results in any change in the collection or use of personal data, we will provide further information to you in that regard. Unless otherwise specified, this Privacy Notice shall apply to any new or further services as well. If this Privacy Notice is amended, this fact will be specifically highlighted on the website. Any amendment to this Privacy Notice shall be effective as of the date of its publication on the website.

## IF YOU ARE UNDER 18 YEARS OLD – INFORMATION FOR THOSE UNDER 18



**Please note that you cannot use our services on the website on your own unless you are over 18 years. If you are under 18 years, ask one of your parents to help you use the website. If you are only **browsing the website and you are under 16 years**, then, before agreeing to the use of cookies, ask one of your parents to help you with the use of this platform, and do not click any button without consulting him or her.**

**For parents:** The website offers various services. Persons under the age of 18 may not use the services on their own. Therefore, in the case of underaged children below the age of 18, we request that not the children but rather the parents use the services. Furthermore, this section also applies to those who are under the charge of a guardian and have fully or partially limited capacity. Persons over the age of 16 can agree to the use of cookies, therefore, in the case of underaged children below the age of 16, we request parents that, provided they agree, they as parents grant the consent to the use of cookies.

## THE CATEGORIES OF PERSONAL DATA PROCESSED; THE PURPOSE AND DURATION OF, AND THE LEGAL BASIS FOR PROCESSING

In the following, you can find a summary table regarding the processing of your personal data, which provides important information on what personal data are collected for what purposes by the Controller in connection with a given operation, what is the legal basis of data processing, and for how long your personal data are stored.

Please be informed that in certain cases the Controller also uses processors under contract in the course of its activities; such recipients are bound by secrecy and data protection obligations. The personal data may also be disclosed to further recipients, such as e.g. in the case of enforcement of your legal claims, to the court, consumer protection authority and arbitration board having subject-matter and territorial competence for the case. Personal data may also be disclosed upon request by a public authority, court or other authority.

Pursuant to Section 5 (5) of the Privacy Act, we shall review the necessity of mandatory data processing cases based on a legal obligation every 3 years if the relevant law does not specify the duration of processing or a different period of review. In accordance with the same legal provision, we shall retain the documentation on the circumstances and results of the review for ten (10) years following such review.

### **1. MESSAGING, CUSTOMER SERVICE**

#### **For what purpose are your personal data processed?**

We process your personal data so that we can respond to your enquiries sent to the Controller's email address, phone number or via the online form available on the website, and we can communicate with you in connection

with your enquiry. Data is also processed so that you can send us messages and we can receive such messages. Data subjects shall include the persons who have sent enquiries or messages in relation to the services through the above contact information.

<b>Which of your personal data do we process:</b>	<b>On what basis do we process these (legal bases):</b>	<b>For how long do we process these personal data (duration of processing):</b>
<p><b>Online on the website:</b></p> <ul style="list-style-type: none"> <li>• name</li> <li>• email address</li> <li>• phone number (optional)</li> <li>• subject matter of the enquiry</li> <li>• any personal data provided in the enquiry</li> </ul> <p><b>Phone:</b></p> <ul style="list-style-type: none"> <li>• name</li> <li>• phone number</li> <li>• subject matter of the enquiry</li> <li>• any personal data provided in the enquiry</li> </ul> <p><b>Email:</b></p> <ul style="list-style-type: none"> <li>• name</li> <li>• email address</li> <li>• subject matter of the enquiry</li> <li>• any personal data provided in the enquiry</li> </ul>	<p style="text-align: center;"><b>Legitimate interest</b> <i>(Article 6(1)(f) of the GDPR)</i></p> <p>Our data processing is necessary so that we can reply to your enquiries and messages, can handle the same, and/or can ensure that you can contact us and we can contact you as well. Data processing is also necessary to ensure the high standards of our business model and our services, and also for our business and economic interests. Having weighed the affected data subjects’ interests, rights and freedoms to freely dispose of their personal data, we have found that processing the data is necessary for enforcing our interests as well as the interests of the data subjects specified herein. There is no other way for us to carry out these data processing operations.</p> <p style="text-align: center;"><b>YOU HAVE THE RIGHT TO OBJECT TO OUR DATA PROCESSING OPERATIONS CARRIED OUT FOR A LEGITIMATE INTEREST</b></p> <p><b>Safeguards:</b> We have restricted the scope of personal data to the strict minimum. Only a limited number of dedicated employees within our organisation have access to the personal data.</p>	<p>Data are retained for 1 year from the completion or closure of the customer service process of the case – provided that there is no other legal ground for the processing.</p> <p>If you have objected to data processing, personal data are processed until the assessment of such objection, except if there is a valid legal basis for further data processing.</p>

**i** You shall have the right to object at any time to processing based on our legitimate interests as above; you may do so via the contact information in the ‘Controller’s name and contact details’ chapter or by notifying it to our data protection manager.

**What happens if you do not provide the data?**

Providing your name and email address (optionally, or your phone number if you are contacting us by phone), along with the subject of the enquiry is a prerequisite of processing the enquiries. If you do not provide the data, we will not be able to process or answer your enquiries, contact you or communicate with you. In the enquiry, you can provide personal data voluntarily if you consider that they are indispensable for the processing of your enquiry; however, we do not expect you to provide such data.

**The manner of erasing the data:** The above data will be erased upon expiry of the above specified time limit, provided that there is no other valid legal basis for data processing.

**To whom we may transmit your data:** Enquiries and/or questions are processed and answered by the dedicated employees within the organisation of the Controller, and your personal data will also be transmitted to the following recipients, processors, for the purposes specified below:

Name	Registered office	Purpose of data transmission or transfer
Google LLC.	1600 Amphitheatre Parkway Mountain View, California 94043 USA	Captcha validation

## 2. COMPLAINT HANDLING

### For what purpose are your personal data processed?

We process your data so that we can handle and/or investigate any complaints in connection with the services available on the website. Furthermore, so that we can identify the person submitting such complaint and we can communicate with him or her in connection with the complaint. Our data processing also serves the purpose to allow you to effectively enforce your consumer rights and/or for the purposes of the relating procedures. The data relating to your consumer complaint are also processed with regard to using the dispute resolution proceedings before arbitration boards and online, and so that we can participate in such proceedings. Data subjects include the persons who have submitted a complaint to the Controller or are mentioned in the complaint.

Which of your personal data do we process:	On what basis do we process these (legal bases):	For how long do we process these personal data (duration of processing):
<p><b>Data in the complaint report:</b></p> <ul style="list-style-type: none"> <li>• first name, surname</li> <li>• your address</li> <li>• place, date and means of submitting the complaint</li> <li>• detailed description of your complaint or entry</li> <li>• list of the documents, data attached to the complaint</li> <li>• place and date of drawing up the report</li> <li>• the unique ID of your complaint</li> <li>• your signature</li> </ul> <p><b>The data in your complaint:</b></p> <ul style="list-style-type: none"> <li>• the data provided by you in addition to the above in connection with your complaint</li> </ul>	<p><b>Compliance with a legal obligation</b> <i>(Article 6(1)(c) of the GDPR)</i></p> <p>Providing you with <b>the possibility to submit complaints verbally or in writing</b> under Section 17/A (2) and (7) of Act CLV of 1997 on Consumer Protection, which act also specifies the data to be recorded in the complaint report. Furthermore, our data processing is based on Section 29 (11) of Act CLV of 1997 on Consumer Protection regarding <b>the mandatory participation of companies in the procedures of arbitration boards</b>, and Regulation (EU) No 524/2013 of the European Parliament and of the Council on online dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC regarding <b>online dispute resolution</b>.</p>	<p>Personal data in relation to <b>complaint handling</b> shall be <b>retained for 5 years</b> under Section 17/A (2) and (7) of Act CLV of 1997 on Consumer Protection.</p>

### What happens if you do not provide the data?

If you submit a complaint, you determine which data you provide to us – providing the data is voluntary. The data to be included in the complaint report are specified by the consumer protection act. If you do not supply the relevant data to us, you may not be able to exercise your rights as a consumer, or at least not in a full scope, or we will not be able to contact or communicate with you. Furthermore, if data are missing, we may only be able

to partially investigate and/or fulfil your complaint or not at all, and we will not be able to effectively participate in arbitration or online dispute resolution. It is our legal obligation to cooperate in the proceedings of the arbitration board.

**The manner of erasing the data:** We will erase your personal data upon expiry of the above relevant deadline, provided that there is no other valid legal basis for data processing.

**To whom we may transmit your data:** Complaints are handled by the dedicated employees of the Controller, and your personal data will also be transmitted to the following recipients, processors, for the purposes specified below:

Name	Registered office	Purpose of data transmission or transfer
consumer protection or other authority with power and competence		proceeding in consumer protection or other official proceedings
arbitration board		proceeding in cases before the arbitration board
online dispute resolution platform and the arbitration board proceeding in the case		dispute resolution if the case is referred to online dispute resolution
current legal representative		providing legal representation if his/her services are used

### 3. ENQUIRIES RELATING TO PROCESSING

#### For what purpose are your personal data processed?

So that the Controller can provide you the opportunity – in a documented manner – to exercise your rights as described in the ‘Your rights and how to enforce them’ chapter. Furthermore, so that – as regards your rights – we can comply with the principle of accountability required from us under the GDPR. After the death of a person affected by the Controller’s data processing – having regard to the authorisation of recital (27) in the GDPR – the Controller also processes data in order to ensure the possibility of enforcing rights related to personal data pursuant to Section 25 of the Privacy Act. Data subjects: are the users who send enquiries or comments regarding the Controller’s processing operations or wish to exercise their rights as data subjects.

Which of your personal data do we process:	On what basis do we process these (legal bases):	For how long do we process these personal data (duration of processing):
<ul style="list-style-type: none"> <li>• data provided in the enquiry</li> <li>• name</li> <li>• e-mail address or other contact information</li> <li>• subject-matter and content of the request</li> <li>• in certain cases, signature</li> <li>• in the case of exercising rights relating to the data of deceased</li> </ul>	<p style="text-align: center;"><b>Legitimate interest</b> <i>(Article 6(1)(f) of the GDPR)</i></p> <p>The personal data are processed by the Controller so that it can answer any data processing enquiries and it can properly document both such enquiries and the measures taken upon them, and/or you can exercise your data protection rights and, furthermore, that the Controller can prove its compliance with the GDPR and the data</p>	<p>Data will be retained for 18 months following the date of enquiry, so that we can prove that we have ensured your rights in accordance with the GDPR, and also for the resolution of any legal disputes. If a relevant proceeding has been initiated, we will process your personal data until closure of the proceeding.</p>

<p>persons: name and contact information of the person entitled to exercise the rights, the necessary data of the death certificate or court decision, and the public document certifying identity and the close relative status and/or the fact of certifying the close relative status, any declaration or order made to the controller.</p>	<p>protection laws upon an authority's inquiry. The Controller's legitimate interest is also in line with Article 5(2) of the GDPR (the principle of accountability) and Article 12(1) of the GDPR, having regard to Article 11 (processing which does not require identification), and documents compliance therewith.</p> <p>Furthermore, data processing for this purpose also serves the enforcement of the Controller's business and economic interests and its legally compliant operation (Section 25 of the Privacy Act). Having weighed the affected data subjects' interests, rights and freedoms to freely dispose of their personal data, we have found that processing the data is necessary for enforcing the Controller's interests as well as your interests specified herein. There is no other way to carry out these data processing operations.</p> <p><b>YOU HAVE THE RIGHT TO OBJECT TO OUR DATA PROCESSING OPERATIONS CARRIED OUT FOR A LEGITIMATE INTEREST</b></p> <p><b>Safeguards:</b> We limited the scope of personal data processed to the minimum. Only a limited number of dedicated employees within the Controller's organisation have access to the personal data.</p>	<p>If you have objected to data processing, personal data are processed until the assessment of such objection, except if our legitimate interests allow for further processing or there is another valid legal ground for the processing of personal data.</p>
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**i** **OBJECTION:** You shall have the right to object at any time to processing based on our legitimate interests as above; you may do so via the contact information in the 'Controller's name and contact details' chapter or by notifying it to our data protection manager.

**What happens if you do not provide the data?**

You may freely decide which personal data you provide to us in your enquiry or while exercising your right; however, if data are missing, we may not be able to fulfil your enquiry or request. The provision of the data may also be a prerequisite of processing your enquiry, and your name is necessary for your identification. In the case of exercising the rights of the deceased person affected by data processing, the data (declaration made to the Controller, death certificate, court decision, public deed certifying identity and/or the close relative status) are necessary under Section 25 (1) and (4) of the Privacy Act; without that, we cannot process and fulfil your request. Please note that when requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

**The manner of erasing the data:** The above data will be erased upon expiry of the above specified time limit, provided that there is no other valid legal basis for data processing.

**To whom we may transmit your data:** Your personal data may be accessed by the Controller's dedicated employees, and the data may be transferred to the competent authority or court, or to the Controller's legal representative for the purposes of conducting the proceedings, and participation and providing legal representation in the same.

#### 4. FULFILMENT OF THE OBLIGATIONS IN RELATION TO PERSONAL DATA BREACHES

##### For what purpose are your personal data processed?

We process personal data so that if necessary, we can notify you of any personal data breach, and can document that such notification has been sent. The Controller's notification obligation on the personal data breach is based on Article 34 of the GDPR, according to which the Controller shall communicate the personal data breach to the data subject when the personal data breach is likely to result in a **high risk** to his or her rights and freedoms and/or if the supervisory authority (NAIH – Hungarian National Authority for Data Protection and Freedom of Information) ordered to controller to do so. The notification shall not be required in the cases regulated in Article 34(3) of the GDPR. Furthermore, we also process your personal data specified herein so that we can comply with our obligation to document personal data breaches in accordance with Article 33(5) of the GDPR. Please note that the personal data breach records contain your data anonymously (e.g. the approximate number of data subjects, categories of data concerned). Data subjects: are the users whose data are affected by the personal data breach detected at the Controller.

Which of your personal data do we process:	On what basis do we process these (legal bases):	For how long do we process these personal data (duration of processing):
<ul style="list-style-type: none"> <li>• name</li> <li>• email address</li> <li>• content of the notification on the breach (in particular: the nature of the personal data breach, consequences, remedial actions taken)</li> </ul>	<p style="text-align: center;"><b>Legitimate interest</b> <i>Under Article 6(1)(f) of the GDPR</i></p> <p>Your personal data are processed by the Controller so that it can fulfil its obligations in accordance with Article 33(5) (documentation of personal data breaches) and Article 34 (communication of a personal data breach to the data subject) of the GDPR, can properly document the same and/or can prove its compliance with the GDPR and the data protection laws upon an authority's inquiry. Data processing also serves purposes of data security, so that we can protect your personal data we process, and can efficiently and quickly defend</p>	<p>Data will be retained for 18 months following the date of communication of the breach, so that we can prove that we have performed our obligations in accordance with the GDPR, and also for reasons of data security. If a relevant proceeding has been initiated, we will process</p>

<p><b>personal data breach records:</b></p> <ul style="list-style-type: none"> <li>• number of data subjects</li> <li>• the categories of personal data concerned</li> <li>• facts regarding the personal data breach</li> </ul>	<p>ourselves against intrusions and attacks. The Controller’s legitimate interest is also in line with Article 5(2) of the GDPR (the principle of accountability) and, under Article 34 of the GDPR, the principle of operating in compliance with the law, which is mandatory for the Controller. Having weighed the affected data subjects’ interests, rights and freedoms to freely dispose of their personal data, we have found that processing the data is necessary for enforcing the Controller’s interests specified herein, and it also serves the interests of the data subjects, given that it is also necessary to protect their personal data. There is no other way to carry out these data processing operations.</p> <p><b>YOU HAVE THE RIGHT TO OBJECT TO OUR DATA PROCESSING OPERATIONS CARRIED OUT FOR A LEGITIMATE INTEREST</b></p> <p><b>Safeguards:</b> We limited the scope of personal data processed to the minimum. Only a limited number of dedicated employees within the Controller’s organisation have access to the personal data.</p>	<p>your personal data until closure of the proceeding.</p> <p>If you have objected to data processing, personal data are processed until the assessment of such objection, except if our legitimate interests allow for further processing or there is another valid legal ground for the processing of personal data.</p>
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**i** **OBJECTION:** You shall have the right to object at any time to processing based on our legitimate interests as above; you may do so via the contact information in the ‘Controller’s name and contact details’ chapter or by notifying it to our data protection manager.

**What happens if you do not provide the data?** There is no need to provide the data; we already have them.

**The manner of erasing the data:** The above data will be erased upon expiry of the time limit specified above.

**To whom we may transmit your data:** Your personal data may be accessed by the Controller’s dedicated employees, and the data may be transferred to the supervisory authority (NAIH), and/or to the Controller’s legal representative for the purposes of conducting the relevant proceedings and providing legal representation in the same.

## 5. ENFORCEMENT OF LEGAL CLAIMS

**For what purpose are your personal data processed?**

So that the Controller can enforce its legal claims or defend itself against the claims asserted against the Controller. Data subjects include the persons concerned by the relevant legal dispute.

<p><b>Which of your personal data do we process:</b></p>	<p><b>On what basis do we process these (legal bases):</b></p>	<p><b>For how long do we process these personal data (duration of processing):</b></p>
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<p><b>Data of the case forming the subject-matter of the claim:</b></p> <ul style="list-style-type: none"> <li>• first name, surname</li> <li>• address</li> <li>• phone number</li> <li>• email address</li> <li>• date, time</li> <li>• in certain cases, signature</li> <li>• subject-matter and content of the legal dispute</li> <li>• the personal data of the natural persons, if any, concerned by the case, depending on the nature and content of the case</li> </ul>	<p style="text-align: center;"><b>Legitimate interest</b> <i>(Article 6(1)(f) of the GDPR)</i></p> <p>The Controller processes the personal data to enforce its business and economic interests, and also so that it can enforce its rights and/or defend itself against the claims asserted against the Controller. This is because if the data are erased, it may be much harder for the Controller to enforce its claims and/or defend itself against claims, and this would prejudice the Controller’s rights. Having weighed the affected data subjects’ interests, rights and freedoms to freely dispose of their personal data, the Controller has found that processing the data is necessary for enforcing the Controller’s interests, and it also serves the interests of the data subjects, given that it is also necessary to protect their personal data. There is no other way to carry out these data processing operations.</p> <p style="text-align: center;"><b>YOU HAVE THE RIGHT TO OBJECT TO OUR DATA PROCESSING OPERATIONS CARRIED OUT FOR A LEGITIMATE INTEREST</b></p>	<p>Personal data are processed as long as the legitimate interest exists, which is expected to be the statute of limitation under civil law + 6 months (foreseeably <b>5.5 years</b>). If proceedings in a case were initiated, personal data are processed until the final completion of the relevant procedure; and if, on that basis, proceedings were launched for the collection of a claim or for revision, until the full settlement of the claim and/or the closure of the relevant procedure; at that point, we will review the processing.</p>
	<p><b>Safeguards:</b> We limited the scope of personal data processed to the minimum. Only a limited number of dedicated employees within the Controller’s organisation have access to the personal data.</p>	

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***What happens if you do not provide the data?***

You do not need to provide the data, as the Controller already has them; we received such data from you or the competent e.g. consumer protection authority, court or other authority in connection with your claim (e.g. consumer complaint, action filed).

**The manner of erasing the data:** The above data will be erased upon expiry of the time limit specified above.

**To whom we may transmit your data:** Your personal data may be transferred to the competent authority, court, public body or bailiff and/or to the controller’s legal representative for the purposes of conducting the relevant proceedings, and participation and providing legal representation in the same.

## 6. BROWSING, COOKIES

When you visit or are browsing the website, the website places cookies – short data files, strings – on your computer. If you want to avoid the application of cookies on your computer or other device used for browsing (e.g. mobile phone, tablet etc.) you have the opportunity to disable the cookies for example through the relevant settings of your browser. For detailed information on cookies and how to disable them and regarding the types of cookies used by the website see the '[COOKIE NOTICE](#)' chapter of the Privacy Notice.

### For what purpose are your personal data processed?

We process your personal data specified below to ensure the proper operation of the website, the proper display of contents, to properly design the user interface, to continuously develop the website to improve user experience and to ensure data security. Furthermore, in order to identify the users' browsing habits, as well as to prepare statistics relating to the website, and to collect anonymised personal data for statistical purposes. The data subjects include the visitors of the website.

Which of your personal data do we process:	On what basis do we process these (legal bases):	For how long do we process these personal data (duration of processing):
<ul style="list-style-type: none"> <li>• the IP address of your device</li> <li>• type of operating system and browser</li> <li>• data of error messages</li> <li>• website activity data</li> <li>• data stored in cookies: if you have accepted cookie settings</li> </ul>	<p style="text-align: center;"><b>Legitimate interest</b> <i>(Article 6(1)(f) of the GDPR)</i></p> <p>Regarding the cookies that are necessary for ensuring the proper operation and basic functions of the website for our users, e.g. navigation on the website, data processing is based on the Controller's legitimate interest in being able to operate its website and/or in using the cookies to ensure the smooth operation of the functions available on the</p>	<p><b>Information in the cookies</b> is stored until the realisation of the purpose (<b>expiry of their validity</b>); or we process the data until you disable data processing. For the exact date of expiry of the individual</p>

	<p>website. The use of such cookies serves your interests as well, namely your interest in being able to use such functions. Having weighed the affected data subjects' interests, rights and freedoms to freely dispose of their personal data, we have found that processing the personal data stored in the cookies that are indispensable for the operation of the website is necessary for enforcing our interests, and it also serves your interests, given that using the website would be impossible without the application of these cookies. There is no other way to carry out these data processing operations and the proper operation of the whole website.</p> <p><b>YOU HAVE THE RIGHT TO OBJECT TO OUR DATA PROCESSING OPERATIONS CARRIED OUT FOR A LEGITIMATE INTEREST</b></p> <p><b>Safeguards:</b> The cookies only process the minimum of personal data, and the cookies we use mostly process data in an anonymised way.</p> <p>Cookies processed based on legitimate interest (for detailed information see the '<b>COOKIE NOTICE</b>' chapter of the Privacy Notice:</p> <ul style="list-style-type: none"> <li>• user-input cookies</li> <li>• authentication cookies</li> <li>• user centric security cookies</li> </ul>	<p>types of cookies  <b>NOTICE</b>  on the website  the  '<b>COOKIE NOTICE</b>' chapter  Privacy</p>
<ul style="list-style-type: none"> <li>• the IP address of your device</li> </ul> <p>For third party cookies (<b>Google Analytics</b>) and/or <b>anonymously</b>:</p> <ul style="list-style-type: none"> <li>• the number of website visitors</li> <li>• referral site</li> <li>• the website pages visited, clicks within the website</li> </ul>	<p style="text-align: center;"><b>Your consent</b>  <i>(Under Article 6(1)(a) of the GDPR)</i></p> <p>For remarketing cookies, cookies displaying advertisements or monitoring user behaviour, displaying general offers, and for statistical cookies, processing is based on your consent.</p> <p><b>You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing performed before the withdrawal of such consent.</b></p>	<p><b>Information in the cookies</b> is stored until the realisation of the purpose (<b>expiry of their validity</b>); or we process the data until you disable data processing.</p> <p>For the exact date of expiry of the individual types of cookies used on the website, see the '<b>COOKIE NOTICE</b>' chapter of the Privacy Notice.</p>

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**What happens if you do not provide the data?**

The personal data are not provided by you, instead we collect them about you, and the data are automatically logged in the system. Such information in itself is not suitable for personal identification, we do not merge these data with other personal data; we use the data for analysing trends, making statistics on the use of the site, administering the services, analysing and meeting users’ demands, all of which contribute to the development of the quality of our services and our website. Certain cookies are essential for the operation of the website; these cannot be disabled.

**The manner of erasing the data:** Cookies are automatically deleted when their validity expires. You can also delete the cookies from your own computer and/or you can disable them in your browser. Cookies can usually be managed in the ‘Settings’ menu of the browser, but this may vary by browser. These are available through the following links (for the most popular browsers):

- Mozilla Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszni>  
<https://support.mozilla.org/hu/kb/privat-bongesz-es-internetezes-meglatogatott-webold>
- Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=enGB>  
<https://support.google.com/chrome/answer/2790761?co=GENIE.Platform%3DDesktop&hl=en-GB>
- Safari: <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>
- Microsoft Edge: <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies> <https://help.opera.com/en/latest/security-and-privacy/#tracking>
- Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-deletemanage-cookies>  
<https://support.microsoft.com/en-gb/help/17438/windows-internet-explorer-view-delete-browsing-history>

**To whom we may transmit your data:** the following persons contribute to making it possible to use, browse and display our website:

Name	Registered office	Purpose of data transmission or transfer
Google LLC.	1600 Amphitheatre Parkway Mountain View, California 94043 USA	Provides web analytics services in relation to the website.
Cloudflare, Ltd.	2nd Floor 25 Lavington Street London	Identifies the clients uniquely, applies security settings on a per-user basis.

**7. DATA PROCESSING IN RELATION TO OUR SOCIAL MEDIA ACCOUNTS**

**For what purpose are your personal data processed?**

For operating our official social media platforms and promoting our activities. We process your personal data on our social media platforms if you like or follow us, post comments or opinions or share something.

**Please note that you have provided your data** to the service provider operating the social media platform in question (e.g. Facebook), and **not to us directly**. Please note that the processing operations carried out by these social media sites is governed by **their own privacy policies**. Please remember that the contents posted on any of our official social media platforms may often be publicly available, and so be careful about what personal data you provide.

<b>Which of your personal data do we process:</b>	<b>On what basis do we process these (legal bases):</b>	<b>For how long do we process these personal data (duration of processing):</b>
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<ul style="list-style-type: none"> <li>• your social media username</li> <li>• as the case may be: the personal data provided by</li> </ul>	<b>Legitimate interest</b> <i>(Article 6(1)(f) of the GDPR)</i>	
<p>you in your social media profile (name, nickname, photo etc.)</p> <ul style="list-style-type: none"> <li>• subject-matter and content of the opinion or comment</li> <li>• your opinion, comment or question on your social media page</li> <li>• feedback</li> <li>• the fact that you were interested in/ are going to/attended the event or cannot attend it</li> </ul>	<p>So that we can ensure the high quality of our services, promote and present to you our activities, and make them available to the wide public. The data processing serves the Controller’s business and economic interests. Having weighed the affected data subjects’ interests, rights and freedoms to freely dispose of their personal data, we have found that processing the data is necessary for enforcing our interests. There is no other way to carry out these data processing operations with the same efficiency and at the same cost level.</p> <p><b>YOU HAVE THE RIGHT TO OBJECT TO OUR DATA PROCESSING OPERATIONS CARRIED OUT FOR A LEGITIMATE INTEREST</b></p> <p><b>Safeguards:</b> We limited the scope of personal data processed to the minimum. Only a limited number of dedicated employees within the Controller’s organisation have access to the personal data.</p>	<p>Until you unsubscribe, unfollow us and/or object to data processing.</p>

**i** **OBJECTION:** You shall have the right to object at any time to processing based on our legitimate interests as above; you may do so via the contact information in the ‘Controller’s name and contact details’ chapter or by notifying it to our data protection manager.

**What happens if you do not provide the data?**

You may freely decide which data you provide on the given social media platform. We do not dispose over the data; you as the user of the given platform provide and dispose over the data. Providing the personal data is not essential for the use of the given social media platform.

**The manner of erasing the data:** The Controller has no influence on the above data; you can modify and/or delete them in your social media profile.

**To whom we may transmit your data:** The data relating to your social media activity will also become known to the social media platform provider (e.g. Facebook) in order to provide the platform services. **Social or other content sharing websites:** Please note that such social media platforms are governed by their own privacy policies, and the **Controller** assumes no liability in connection with that.

**8. RENDERING ELECTRONIC DATA INACCESSIBLE, DATA RECOVERY**

**For what purpose are your personal data processed?**

The Controller processes the data of the data subjects affected by the relevant decision in order to execute the court decision passed in the criminal proceedings on rendering electronic data inaccessible or the recovery of such data, in order to comply with a legal obligation.

Which of your personal data are processed by the Controller:	On what bases are these personal data processed by the Controller (legal bases):	For how long are these personal data processed by the Controller (duration of processing):
Personal data specified in the court decision: <ul style="list-style-type: none"> <li>• the person passing the decision and his/her position</li> <li>• the personal data that must be rendered inaccessible or must be recovered</li> <li>• the data of the Client whom the Controller is obliged to inform on the fact of rendering data inaccessible or recovery</li> </ul>	<p style="text-align: center;"><b>Compliance with a legal obligation</b> <i>(Article 6(1)(c) of the GDPR)</i></p> <p>under <b>Section 12/A of Act CVIII of 2001</b> on Certain Issues of Electronic Commerce Activities and Information Society Services.</p>	The Controller will retain the decision (including the personal data indicated therein) until the end of the statute of limitation period (that is usually <b>5 years</b> ). The document/records proving that the data have been rendered inaccessible or have been recovered will be retained by the Controller until the end of the statute of limitation period (that is usually <b>5 years</b> ) as well.

**What happens if the data are not provided?**

Data subjects do not need to provide the personal data; these are already included in the court decision. Processing is necessary for compliance with a legal obligation.

**The manner of erasing the data:** The personal data will be erased upon expiry of the time limit specified above.

**To whom the Data Controller may transmit the personal data:** Only the Controller participates in the processing through its dedicated staff.

**9. COPYRIGHT, TRADEMARK OR OTHER INFRINGEMENT ENQUIRIES**

**For what purpose are your personal data processed?**

The Controller processes the personal data of the data subjects affected by copyright, trademark or other infringement enquiries in order to comply with its legal obligation on the handling of the enquiries.

Which of your personal data are processed by the Controller:	On what bases are these personal data processed by the Controller (legal bases):	For how long are these personal data processed by the Controller (duration of processing):

<p>The personal data included in the enquiry; usually:</p> <ul style="list-style-type: none"> <li>• the enquirer's name, contact details, signature</li> <li>• the name, address and signature of witnesses or the name and position of the notary public/the person issuing the court or authority decision</li> <li>• the data of the user providing information</li> </ul>	<p><b>Compliance with a legal obligation</b> <i>(Article 6(1)(c) of the GDPR)</i></p> <p>under <b>Section 13 of Act CVIII of 2001</b> on Certain Issues of Electronic Commerce Activities and Information Society Services.</p>	<p>The Controller will retain the enquiry (including the personal data indicated therein) until the end of the statute of limitation period (that is usually <b>5 years</b>). The document/records proving that the data have been removed or removal was refused will be retained by the Controller until the end of the statute of limitation period (that is usually <b>5 years</b>) as well.</p>
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**What happens if the data are not provided?**

The personal data are provided by the enquirer; providing the data is a prerequisite of performing the legal obligation.

**The manner of erasing the data:** The personal data will be erased upon expiry of the time limit specified above.

**To whom the Data Controller may transmit the personal data:** Only the Controller participates in the processing through its dedicated staff.

[LINKS TO OTHER WEBSITES](#)

Please note that for your convenience and to provide you more comprehensive information, we may include **links** and/or menus **to other websites** on the website. These websites and blogs operate **independently of us**, they have their own privacy policies for data processing, and we have no influence on these. You are recommended to also read the privacy notices of any such website you visit.

[ACCESS TO DATA, DATA SECURITY MEASURES, INCIDENT MANAGEMENT](#)

The Controller will do everything in its power to take care of the security of your personal data in compliance with Article 32 of the GDPR. In addition to that, the Controller will take the technical and organisational measures and have in place the procedural rules as necessary to comply with the GDPR and other relevant data protection and confidentiality regulations.

**The Controller guarantees the appropriate level of data security in the following manner:**

- we store your personal data in a secure technical environment, and only make them available to authorised persons (our employees or subcontractors, after appropriate identification);
- we use https protocol when processing the data, so that you and the server communicate through an encrypted channel;
- the natural persons having access to the personal data may only process the personal data in accordance with the Controller's instructions;
- we protect your data from unauthorised access, and use security measures to this end;
- we use encryption with an appropriate technical solution when data are transferred;
- we ensure that the integrity of data can be verified;
- we test, assess and/or improve our security measures regularly.

**Personal data breach:** If a breach takes place concerning your data, after becoming aware thereof, we will do everything in our power to mitigate the risks. If such an event takes place concerning your data which, in spite of the protection measures taken by the Controller (or its processor), is likely to result in a high risk to your rights and freedoms, we will notify you and also the competent supervisory authority thereof without delay (including any steps you can take).

## DATA TRANSFER TO A THIRD COUNTRY

Personal data may only be transferred to a third country if the third country in question ensures an adequate level of protection. Such a transfer shall not require any specific authorisation.

Currently, the data are transferred to the following controllers and processors to the following third countries outside the EU, for the following purposes:

<b>Processor's name, registered office, country</b>	<b>Adequacy decision – under Article 45(1) of the GDPR</b>	<b>Purpose of data transmission, transfer and processing</b>
<b>Google LLC.</b> 1600 Amphitheatre Parkway Mountain View, California 94043 USA	Commission Implementing Decision (EU) 2016/1250 (USA - EU Privacy Shield List)	Provides web analytics services in relation to the website; provides the captcha identification service.

## PROFILING

Please note that as part of our data processing operations, we perform profiling in accordance with this chapter.

Google as an independent service provide may perform profiling as follows, which may also have an impact on our website, given that we use the Google Analytics service on the website.

Google's notice on the service: The controller measures the visitation data of our website using **Google Analytics**, a web analytics service provided by Google, LLC ('Google'). Google Analytics mainly uses first-party cookies to report on visitor (aka. user) interactions on Google Analytics customers' websites. The advertising functions of Google Analytics can be activated with the help of Google advertising cookies – such as remarketing – regarding products of the Google Display Network such as AdWords. For information regarding data protection settings and disabling cookies, please check: <https://support.google.com/analytics/answer/6004245?hl=en>. Each computer and device connected to the internet receives a unique number called IP address (Internet Protocol address). These numbers are allocated in blocks by countries, and so an IP address can often be used to identify the country, state/county from where the computer connects to the internet. As, due to the working principle of the internet, websites are using IP addresses, website owners can learn their users' IP address even if they do not use the Google Analytics service. However, Google Analytics only collects the IP addresses of the website users to ensure the security of the service and allow website owners to know in what parts of the world their users are located (this is also called 'IP geolocation'). Data is stored in an encoded format optimized for performance, rather than stored in a traditional file system or database manner. Data is dispersed across a number of physical and logical volumes for redundancy and expedient access, thereby obfuscating it from tampering. Google applications run in a multi-tenant, distributed environment. Rather than segregating each customer's data onto a single machine or set of machines, data from all Google users (consumers, business, and even Google's own data) is distributed among a shared infrastructure composed of Google's many homogeneous machines and located in Google's data centers. For further information about Google's privacy principles, click here: <https://policies.google.com/privacy?hl=en>. You can also unsubscribe from Google Analytics tracking in the future by downloading the Google Analytics Opt-out Browser Addon application and installing it to your current browser: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

## COOKIE NOTICE

**What are cookies?** The anonymous user identifier (cookie) is a unique series of signs – suitable for identification and the storage of profile information – that service providers store on your device. It is important to know that such a series of signs is not suitable in itself for identifying you, it can only identify your computer. In the world of internet networks, personal information and customised service can only be rendered if service providers can individually identify their customers' habits and needs. Service providers use anonymous identification to learn more about their customers' information usage habits, and so they can further ameliorate the quality of their services, and be able to offer customisation opportunities to the clients.

**What are tracking tools?** Tracking is possible using various technologies, such as pixel technology or log file analysis. Tracking tools allow to measure and monitor user actions on the websites and website traffic.

**Disabling cookies:** Most internet browsers allow the saving of cookies as a default setting. However, each user has the option to regulate the use of cookies in their browser. If you wish to avoid that such identifiers be stored on your computer, you can select the relevant settings in your browser so that it does not permit the placement of unique identifiers or permits only certain of them – in such a case, however, you may not be able to access certain services or not in the form as if you had enabled the placement of identifiers. Therefore, please note that disabling all or some of the cookies may affect the operation of the website. In each case, disabling will only apply to the given browser.

**Enabling cookies:** By enabling cookies in the settings of your browser, you agree to the use of cookies and the data processing involved. You can change the settings and withdraw your consent (disable cookies) any time. The withdrawal of consent shall not affect the lawfulness of processing performed before the withdrawal of such consent.

**Changing cookie settings:** You can change cookie settings any time, and can disable or enable cookies.

**Deletion:** You have the opportunity to delete cookies upon closing the browser.

**Enabling or disabling tracking, changing tracking settings:** When you browse the web, you can send a request to websites not to collect or track your browsing data. This function is usually turned off by default. This means that tracking is enabled by default, however, by changing the relevant settings, you can send a request any time to disable tracking. You can send the request for disabling tracking any time, and can change the tracking settings any time. However, what happens to your data depends on how a website responds to the request. Many websites will still collect and use your browsing data. You may need to reload the website to apply your selected settings.

**Disabling, enabling, deletion and settings in major browsers:**

Mozilla Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>  
<https://support.mozilla.org/hu/kb/privat-bongesz-es-internetezes-meglatogatott-webold>

Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=enGB>  
<https://support.google.com/chrome/answer/2790761?co=GENIE.Platform%3DDesktop&hl=en-GB>

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

Microsoft Edge: <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy>

Opera: <https://help.opera.com/en/latest/web-preferences/#cookies> <https://help.opera.com/en/latest/security-and-privacy/#tracking>

Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-deletemanage-cookies> <https://support.microsoft.com/en-gb/help/17438/windows-internet-explorer-view-delete-browsing-history>

**The cookies and tracking tools we use:**

### Essential cookies

Name	Legal basis	Function	Information	Expiration	Type
cookieconsent_status	legitimate interest	To control if the user accepted cookie settings.	numeric characters	1 year	own (first party) cookie
_cfduid	legitimate interest	Cloudflare, Ltd. (2nd Floor 25 Lavington Street London) cookie uniquely identifies the clients, applying security settings on a per-user basis.	unique identifier based on alphanumeric characters	30 days	third party cookie

#### Statistical cookies

Name	Legal Basis	Function	Information	Expiration	Type
_ga	consent	Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) cookies are used to identify individual users in browsing sessions. The system cannot identify individual users on different browsers or devices. They are statistical cookies measuring website traffic and user behaviour.	alphanumeric characters	2 years	third party cookie
_gid	consent	Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) cookies are used to differentiate users. They store unique session identifiers to which Google associates the properties of users' consumption habits. They are statistical cookies measuring website traffic and user behaviour.	alphanumeric characters	24 hours	third party cookie
_gat	consent	Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) cookies are displayed when you install Google Analytics with Google tag manager. They are used to limit events towards Google Analytics service, they limit excessive data collection on high-traffic sites.	alphanumeric characters	1 minute	third party cookie

## Others

Name	Legal Basis	Function	Information	Süti lejárata	Type
PREF, NID, HSID, APISID, SID, NID	consent	Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) cookies are used to determine if the user is a human or a robot based on the information available. They are used to protect forms available on the website.	alphanumeric characters	1 year	third party cookie

### General information on the main categories of cookies:

#### 1. Session cookies and persistent cookies

Session cookies usually serve to prevent data loss. Session cookies are valid only during the user's session, and upon finishing the session and/or closing the browser, this type of cookies is automatically deleted from the user's computer. Such cookies include e.g. user input cookies or authentication cookies. Conversely, persistent cookies are stored on the user's device as long as they are valid.

#### 2. First-party cookies and third-party cookies

Cookies must also be differentiated as to who installs them. The cookies installed by the website are first-party cookies, while the cookies integrated into the website by external providers are the third-party cookies. These cookies are often installed for statistical purposes. Such cookies may include so-called social plug-in modules, which the website uses to display various content through external web services (embedded content). These cookies store data on the products and services viewed by you, and use these data to display to you the same products or services on advertising platforms other than the website. The data are transmitted to the service providers providing the cookies. These cookies also help third-party providers recognise their members when interacting with the plug-in modules. Such cookies are usually used by Facebook, Google and Youtube, processing data for dynamic remarketing purposes. The providers of cookies are individual controllers and have their own privacy notices.

#### 3. Cookies technically essential or technically non-essential for the website's operation

Certain types of cookies are essential for the operation of the website. You cannot enable or disable these cookies in the browser settings; however, you can also find information on these in this **Cookie Notice** Chapter. Furthermore, certain cookies are used for convenience purposes to assist the operation of the websites, or so that users can more conveniently use the online offers displayed, or they display customised marketing offers to users, or analyse user behaviour. These cookies are technically not essential for the operation of websites, so they can be disabled.

## [YOUR RIGHTS AND HOW TO ENFORCE THEM](#)

You shall have the following rights in connection with your personal data processed by us:

1. **Right of access**
2. **Right to rectification**
3. **Right to erasure**
4. **Right to restriction of processing**
5. **Right to data portability**

6. **Right to object**
7. **Right to withdraw consent**
8. **Exercising rights after death**

#### 1. **RIGHT OF ACCESS**

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You shall have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, about the following: what personal data are processed (in what categories), for what purpose, for how long, and the recipients of such data. Furthermore, you may request information as to what rights you have in connection with processing i.e. that you may request the erasure, restriction of processing of personal data, the rectification of data, and may object to processing. Furthermore, you shall have the right to file a complaint with the supervisory authority (Hungarian National Authority for Data Protection and Freedom of Information, Nemzeti Adatvédelmi és Információszabadság Hatóság, registered office: H-1024 Budapest, Szilágyi Erzsébet fasor 22/C., website: [www.naih.hu](http://www.naih.hu), phone number: +36 (1) 391-1400, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). Where the personal data have not been collected from you, you may request information as to their source.

#### 2. **RIGHT TO RECTIFICATION**

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You may request that your personal data be rectified, corrected or made accurate, if they have changed or have been wrongly recorded. If your personal data have been recorded incompletely, you may also request their completion by means of a supplementary statement.

#### 3. **RIGHT TO ERASURE**

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You shall have the right to obtain the erasure of personal data concerning you where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which we have collected or processed them
- you withdraw consent on which the processing is based, and there is no other legal ground for the processing
- you object to the processing and there are no overriding legitimate grounds for the processing
- we have processed the personal data unlawfully
- the data have to be erased for compliance with a legal obligation - in relation to services directly offered to children.

Where we have made the personal data public, we shall take reasonable steps to inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data. Please note that we will not be able to fulfil your erasure request if the personal data are necessary for the establishment, exercise or defence of legal claims; the erasure would restrict the exercising of the right of freedom of expression and information; or if a legal obligation applicable to us (or purposes in the public interest, scientific or historical research purposes or statistical purposes) requires us to act contrary to the request.

#### 4. **RIGHT TO RESTRICTION OF PROCESSING**

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You shall have the right to obtain from us restriction of processing where one of the following applies:

- you do not think that the personal data are accurate; in such a case restriction applies to a period enabling us to verify the accuracy of the personal data

- the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead
- we no longer need the personal data, but they are required by you for the establishment, exercise or defence of legal claims
- you object to processing, in such a case restriction applies pending the verification whether our legitimate grounds override your legitimate grounds

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State. We shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We shall inform you about those recipients upon request.

## 5. RIGHT TO DATA PORTABILITY

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You shall have the right to receive the personal data we process concerning you, and have the right to transmit (or have us transmit upon your instruction) those data to another controller specified by you, if processing is based on your consent or the performance of a contract, and is carried out by automated means. Portability shall be without prejudice to the rights and freedoms of others, and to the right of erasure (right to be forgotten).

## 6. RIGHT TO OBJECT

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You shall have the right to separately object to processing of personal data concerning you which is based on the Controller's or another person's legitimate interest, public interest, or is carried out in the exercise of official authority, including profiling. **Please note that we perform profiling as described in the 'PROFILING' chapter of this Privacy Notice.** In such cases we shall no longer process your personal data unless processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or are necessary for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. After such objection, we may no longer process the data.

## 7. RIGHT TO WITHDRAW CONSENT

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You shall have the right to withdraw your consent granted to the processing of personal data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## 8. ENFORCEMENT OF RIGHTS RELATING TO PERSONAL DATA AFTER THE DATA SUBJECT'S DEATH

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Pursuant to the Hungarian Privacy Act: Within five years of the death of the data subject, the following rights may be enforced in relation to the data of the deceased person by a person authorised to do so by the data subject in the form of an administrative disposal or a declaration made at the Controller and incorporated in a public deed or a private deed of full probative value: right of access, rectification, erasure, restriction and objection. If the data subject has made more than one declaration, the declaration of the later date may be used to enforce the rights. If the data subject has not made an administrative disposal or a declaration at the Controller, his or her close relative according to the Civil Code first contacting the Controller may demand rectification or object to processing, and – if the processing had already been unlawful in the life of the data subject or if the purpose of processing terminated upon the death of the data subject – demand erasure or the restriction of processing of

the deceased person's data within five years of the death of the data subject. Upon request, the Controller shall inform the data subject's close relative on the measures taken, unless the data subject had prohibited it.

The person enforcing the data subject's rights shall verify the fact and the date of the data subject's death with a death certificate or with a court decision, as well as his own personal identification, together with his status as a close relative, with a public deed, in accordance with the law.

**The following means of legal enforcement and remedies are available to you in connection with our processing of your personal data:**

1. You may contact us
2. You may enforce your right to file a complaint
3. You may turn to court
4. You may demand compensation

**1. YOU MAY CONTACT US**

If you have a complaint in relation to data processing or wish to exercise your rights, you can use our following contact information for that purpose:

Email: [office@webgarden.eu](mailto:office@webgarden.eu)

**Mailing address:** H-1143 Budapest, Stefánia út 16. I. em. 2/a, Hungary

We shall inform you without undue delay and at the latest within one month of receipt of the request of any measures taken further to your request, or of the reasons for not taking action. That period may be extended by two further months if the request is complex or a high number of requests is received. We will provide the information by electronic means where possible. Information and any actions taken shall be provided free of charge, unless the requests are manifestly unfounded or excessive, in particular because of their repetitive character. In such cases we may charge a reasonable fee or refuse to act on the request. We may request the provision of information necessary to confirm your identity in connection with the request. A copy of your personal data processed by us may also be requested free of charge for the first time; for any further copies, we shall charge a fee corresponding to administrative costs.

**2. RIGHT TO LODGE COMPLAINTS**

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If you believe that our data processing does not comply with the law, you may lodge a complaint with the supervisory authority; you can also lodge a complaint with the supervisory authority if we fail to act upon your request without delay but within no more than a month of receipt of the request and/or we fail to notify you of the reason of the delay. The main supervisory authority of the Controller's headquarters **in Hungary is the Hungarian National Authority for Data Protection and Freedom of Information** (Nemzeti Adatvédelmi és Információszabadság Hatóság), with its registered office at: H-1024 Budapest, Szilágyi Erzsébet fasor 22/C., website: [www.naih.hu](http://www.naih.hu), phone number: +36 (1) 391-1400, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu).

**3. RIGHT TO TURN TO COURT**

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You have the right to turn to court: **(i)** against the binding decision passed by the supervisory authority concerning you, **(ii)** if we fail to act upon your request without delay but within no more than a month of receipt of the request and/or we fail to notify you of the reason of the delay, **(iii)** if the supervisory authority neglects your complaint, has rejected your complaint although you think it was justified, or completely fails to notify you of the developments and results regarding your complaint within three (3) months, **(iv)** without prejudice to your right of complaint, you may turn to court if you believe that your rights under the GDPR have been violated as the processing of your data did not comply with the GDPR. Proceedings against the Controller shall be brought before

the courts of the Member State where the Controller has an establishment (i.e. Hungary). Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

#### **4. RIGHT TO COMPENSATION**

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If you have suffered material or non-material damage (grievance award) as a result of violation of the GDPR, you are entitled to compensation from the Controller or the data processor for any damage suffered. We shall be exempt from liability if we prove that we are not in any way responsible for the event giving rise to the damage.

#### **LEGAL BACKGROUND FOR PROCESSING**

The Controller processes your personal data under the following laws:

1. **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 Directive 95/46/EC (**'GDPR'**)
2. Hungarian law: Act CXII of 2011 on Informational Self-Determination and Freedom of Information (**'Privacy Act'**)
3. Hungarian law: Act V of 2013 on the Civil Code of Hungary (**'Civil Code'**)

#### **GOVERNING LAW AND OTHER PROVISIONS**

This Privacy Notice shall be governed by the laws of Hungary.

Should the laws in effect in your country impose rules on you which are more stringent than those in this Privacy Notice, you shall be obliged to comply with those more stringent rules. You, however, acknowledge and accept that the Controller's liability is based on the laws governing this Privacy Notice, and that, to the greatest extent permissible under the relevant laws and court decisions, it excludes its liability for not complying with the provisions applicable in the user's country.

The headings herein are for convenience only; in themselves they are not sufficient to understand the details of processing. Should you have any questions not clearly answered in this Privacy Notice, please feel free to notify us thereof via the **office@webgarden.eu** email address.

**Webgarden IT and Design Services Kft.**