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Céginformáció.hu Privacy regulation

Céginformáció.hu Ltd.

Information on data management

Introduction

A/That

Céginformáció.hu Kft.

(1191 Budapest, Üllői u. 200, tax number: 10347036-2-43, company registration number/registry number: 0109065988) (hereinafter: Service provider, data manager) is subject to the following regulations:

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL On the protection of natural persons with regard to the processing of personal data and on the free flow of such data and on the repeal of Regulation 95/46/EC (General Data Protection Regulation) (April 2016) 27.), we provide the following information.

Present data protection regulation the below pages/mobile applications data management governed by:

<https://www.opencompanydatabase.com/>

The data protection policy is available from the following website:

portal.ceginformacio.hu Changes to the policy will come into effect upon

publication at the above address.

The data controller and contact details

Name:

Céginformáció.hu Ltd.

Headquarters: 1191 Budapest, Üllői u.

200 Email: info@ceginformacio.hu

Phone: 0613333000

Concept definitions

1. "*personal data* ": any information relating to an identified or identifiable natural person ("data subject"); the natural person who, directly or indirectly, can be identified, especially an identifier, for example name, song, locator data, online identifier obsession the natural person physical, physiological, identifiable on the basis of one or more factors relating to his genetic, intellectual, economic, cultural or social identity;
2. "*data management* ": the personal data obsession on data files automated obsession no automated way completed any operation obsession operations total, like this the collection, recording, organization, segmentation, storage, conversion or changing, querying, viewing, using, communicating, transmitting, distributing or making accessible in any other way item through coordination obsession interconnection, restriction, deletion, respectively destruction;
3. "*data controller* ": the the natural obsession yogi person, public authority body, agency obsession any other body, which the personal data treatment goals and your tools independently obsession with others together define; if the the purposes and means of data management are determined by EU or member state law, the data manager or special aspects regarding the appointment of the data manager may also be determined by EU or member state

law;

4. " *data processor* ": the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller;
5. " *addressee* ": the the natural person, public authority body, agency or any other body, with whom or with which the personal data informs regardless from that third are you afraid On it public authority organs, which in the context of an individual investigation, they have access to personal data in accordance with EU or Member State law, they are not considered recipients; the management of said data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of data management;
6. " *consent of the data subject* ": the voluntary, specific and clear declaration of the will of the data subject based on adequate information, with which the data subject indicates by means of a statement or an act clearly expressing the confirmation that he gives his consent to the processing of personal data concerning him;
7. " *data protection incident* ": the safety it's like that injury, which the forwarded stored information other way handled results in the accidental or illegal destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data.

THE personal data for treatment concerning principles

THE personal data:

1. processing must be carried out legally and fairly, as well as in a transparent manner for the data subject (" *legality, fair proceedings and transparency* ");
2. should only be collected for specific, clear and legitimate purposes, and should not be processed together with these purposes no negotiable manner; the 89. article (1) of paragraph appropriately no it counts as the original with a purpose together not negotiable the public interest archiving for the purpose of scientific and historical research purpose or statistical further data processing for a purpose (" *purpose binding* ");
3. they must be appropriate and relevant in terms of the purposes of data management and must be limited to what is necessary (" *data economy* ");
4. they must be accurate and, where necessary, up-to-date; all reasonable measures must be taken to promptly delete or correct personal data that is inaccurate for the purposes of data processing (" *accuracy* ");
5. its storage must take place in a form that allows the identification of the data subjects only for the time necessary to achieve the goals of personal data management; personal data may only be stored for a longer period of time if the processing of personal data is in the public interest in accordance with Article 89 (1) archiving for the purpose of scientific and historical research purpose or statistical purpose costs then bear, is e in the decree the are affected rights and freedoms protection in order to prescribed appropriate technical and organizational measures for its implementation too with attention (" *limited storability* ");
6. must be handled in such a way that adequate security of personal data is ensured through the application of appropriate technical or organizational measures, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage of data (" *integrity and confidentiality* ") .

The data controller is responsible for compliance with the above , and must also be able to prove this compliance (" *accountability* "). The data controller declares, that data management the present in point is occupied principles appropriately is happening.

Registration (user drawer creation)

1. The data collection the fact the handled data circle and the **data handling goals** :

Personal data	The data handling its goal	Legal basis
Last name, first name	Identification, to the user account by safe entry serves.	6. article (1) paragraph the) point.
E-mail title	Keeping in touch, sending system messages, users account by entry	6. article (1) paragraph the) point.
THE registration Time	Technical operation implementation.	6. article (1) paragraph the) point.
THE registration age IP title	Technical operation implementation.	6. article (1) paragraph the) point.

The e-mail title case no required, that personal data contain.

2. **The are affected scope** : the website registered all affected.

3. Duration of data management, deadline for data deletion : If one of the conditions set out in Article 17 (1) of the GDPR exists, it lasts until the data subject's request for deletion. By canceling the registration, the personal data will be deleted immediately data. The affected by specified any personal data deletion the data controller the GDPR 19. article informs the data subject electronically. If the data subject's deletion request also covers the e-mail address he/she has provided, the data controller will also delete the e-mail address after the information has been provided.

4. The data to get to know is eligible possible data controllers person, the personal data Recipients : THE personal data may be handled by the authorized employees of the data controller based on the provisions of this information.

5. The are affected with data management related rights Description :

- ♦ The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and
- ♦ the affected yoga there is the for data portability, furthermore the contribution any at the time for withdrawal.

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

- ♦ postal on the way the 1191 Budapest, Ullői u. 200 at
- ♦ e-mail through a/that info@ceginformacio.hu e-mail at
- ♦ 0613333000 number.

7. Data management legal basis : 6. article (1) paragraph a) point, that is consent of the affected person .

8. We inform you, that

- ♦ the data handling **the you on his consent is based on.**
- ♦ **required** the personal data to give that to register we know.
- ♦ the data provision failure to do so with that the **with consequence walks** _ that the users account no we know
- ♦ created to bring. the contribution withdrawal no touch the on consent based on the withdrawal before data handling legality.

Web shop for operation/service for use connecting data handling

1. The data collection the fact the handled data circle and the **data handling purpose :**

Personal data	The data handling its goal	Legal basis
Wire and first name	THE to contact, the for shopping, the regular invoice for the exhibition, the cancellation law to exercise required.	the GDPR 6. article (1) paragraph b) point and the Elker TV. 13/A. § (3) paragraph.
E-mail title	Keeping in touch.	
Phone number	contact, the with invoicing, obsession the questions about shipping more efficient negotiation.	
Billing name and title	TH regular invoice exhibition, E	6. article (1) paragraph c) point, and the

	also the creation and content of the contract definition, modification, monitoring of its performance, invoicing of the resulting fees, and enforcement of related claims.	about accounting solo 2000. yearly C. law Paragraph (2) of § 169
THE order / buying Time	Technical operation implementation.	the GDPR 6. article (1) paragraph b) point
THE order / buying IP title	Technical operation implementation.	and the Elker TV. 13/A. § (3) paragraph.

The e-mail title case no required, that personal data contain.

2. The range of stakeholders: On the webpage all buyers affected.

3. Duration of data management, deadline for data deletion: If one of the conditions set out in Article 17 (1) of the GDPR exists business the affected deletion until your request lasts The affected by specified any personal data deletion the data controller informs the data subject electronically based on Article 19 of the GDPR. If the data subject's deletion request also covers the e-mail address he/she has provided, the data controller will also delete the e-mail address after the information has been provided. Except for accounting receipts case, since the about accounting solo 2000. yearly C. law 169. § (2) paragraph Based on 8 for a year this data must be preserved. The data subject's contractual data can be deleted after the expiration of the civil law limitation period based on the deletion request of the data subject.

THE accounting settlement directly and indirectly supporting accounting receipt (including the ledger invoices, analytical and detailed records as well), must be readable for at least 8 years, reference to accounting records Based on can be retrieved way keep.

4. The data to get to know is eligible possible data controllers person, the personal data Recipients : THE personal data can be handled by the data manager's sales and marketing staff, in compliance with the above principles.

5. The are affected with data management related rights Description :

- The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and
- the affected yoga there is the for data portability, furthermore the contribution any at the time f o r withdrawal .

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

- postal on the way the 1191 Budapest, Ullői u. 200 at
- e-mail through a/that info@ceginformacio.hu e-mail at
- 0613333000 number.

7. The data handling legal basis :

1. the GDPR 6. article (1) paragraph b) and c) point,

2. certain issues of electronic commerce services and services related to the information society . Act (hereinafter: Elker Law) 13/A. Section (3):

For the purpose of providing the service, the service provider may process the personal data that is technically necessary for the provision of the service necessarily are necessary. THE service provider the other conditions identity in case of business must to choose and in all cases, it must be operated in the manner used during the provision of services related to the information society tools, that personal data for treatment just then be avoided beer, if this the service for stretching and the in this law defined other goals to its fulfillment absolutely required, However in this the case too just the to the extent and duration necessary.

3. THE accounting legislation appropriate invoice exhibition in case of the 6. article (1) paragraph c) point.

4. THE from a contract resulting demands validation in case of the Civil About the law book solo 2013 yearly V. law 6:21 a.m. according to § 5 years.

6:22 a.m. § [Prescription]

(1) If this law is different does not have, the claims are five expire in a year .

(2) The statute of limitations then it starts when the claim due becomes

(3) The statute of limitations time to change directed agreement into writing must Reserve.

(4) The agreement excluding the limitation period null and void.

8. We inform you, that

- ♦ **data management is necessary for the performance of the contract and the**
- ♦ **submission of an offer . obliged** the personal data to give that we know the your order complete.
- ♦ the data provision failure to do so with that the **with consequence** walks that no we know the your order process.

Contact

1. The data collection the fact the handled data circle and the **data handling purpose** :

Personal data	The data handling its goal	Legal basis
Name	Identification	6. article (1) paragraph the) point
E-mail title	contact, response messages sending	6. article (1) paragraph the) point
THE contact Time	Technical operation implementation.	6. article (1) paragraph the) point
THE at the time of contact IP title	Technical operation implementation.	6. article (1) paragraph the) point

The e-mail title case no required, that personal data contain.

2. **The are affected scope** : THE relational form across message sender all affected.

3. **Duration of data management, deadline for data deletion** : If the conditions set out in Article 17 (1) of the GDPR one of them exists business the affected deletion until your request lasts THE contribution with its withdrawal the relational personal data entered in the form will be deleted.

4. **The data to get to know is eligible possible data controllers person, the personal data Recipients** : THE personal data can be handled by authorized employees of the data controller.

5. **The are affected with data management related rights Description** :

- ♦ The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and
- ♦ the affected yoga there is the for data portability, furthermore the contribution any at the time f o r withdrawal .

6. **The data subject can initiate access to personal data, their deletion, modification, or limitation of processing, as well as data portability in the following ways** :

- ♦ postal on the way the 1191 Budapest, Ullői u. 200 at
- ♦ e-mail through a/that info@ceginformacio.hu e-mail at
- ♦ 0613333000 number.

7. **Legal basis for data management** : consent of the data subject, Article 6 (1) point a) GDPR. If you contact us, consent to that the contact during to us cost personal your data (name, phone number, e-mail title) we handle it in accordance with these regulations.

8. We inform you, that

- ♦ **this data management is based on your consent and is necessary for making an offer . you**
- ♦ **are required** to provide personal data in order to contact us.
- ♦ the data provision failure to do so with that the **with consequence walks** _ that no you know to pick up the relationship w i t h the data controller.
- ♦ the contribution no withdrawal affects the consent-based, the withdrawal prior data management legality.

Complaint handling

The data collection the fact the handled data circle and the data handling purpose :

Personal data	The data handling its goal	Legal basis
Wire and first name	Identification, contact.	Article 6 (1) c) and consumer protection of 1997 CLV. Act 17/A. (7) of §
E-mail title	Keeping in touch.	
Phone number	Keeping in touch.	
Billing name and title	Identification, quality objections arising in relation to the ordered products/services, questions and problems his treatment.	

1. The **range of stakeholders** : On the webpage buyer and with quality objection live, complain all of them affected.
2. **Duration** of data management, deadline for deletion of data: Record of objection, transcript and response duplicate copies the on consumer protection solo 1997 yearly CLV. law 17/A. § (7) paragraph Based on 3 for a year must be preserved.
3. **The data to get to know is eligible possible data controllers person, the personal data Recipients** : THE personal data can be handled by the data controller and its employees authorized to do so, in compliance with the above principles.
4. **The are affected with data management related rights Description** :
 - ♦ The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and
 - ♦ the affected yoga there is the for data portability, furthermore the contribution any at the time for withdrawal
5. **The data subject can initiate access to personal data, their deletion, modification, or limitation of processing, as well as data portability in the following ways** :
 - ♦ postal on the way a/that 1191 Budapest, Ullői u. 200 at
 - ♦ e-mail through a/that info@ceginformacio.hu e-mail at
 - ♦ 0613333000 number.
6. We inform you, that
 - ♦ the personal data service **yogi on obligation** is based on.
 - ♦ the contract binding **prerequisite** the personal data his treatment.
 - ♦ **obliged** the personal data to give that your complaint handle we know.
 - ♦ the data provision failure to do so with that the **with consequence** walks that no we know handle the to us received your complaint.

B2B Customer relations data handling

Present in point the data controller business partners, respectively other its customers on behalf of Acting natural persons governs the handling of the contact data of (those concerned).

1. The data collection the fact the handled data circle and the data handling its goal:

Personal data	The data handling its goal	Legal basis
Name, e-mail address, phone number, other contact information included in the contract.	Maintaining contact, cooperation, concluding a contract, fulfilling the rights and obligations arising from the contract.	Yogi persons in case of: 6. article(1) paragraph f) point (legitimate interest of the data controller), Individual entrepreneurs in case of Article 6, paragraph 1, point b).

2. The data source:

- ♦ Yogi personal in case of: the affected personal your data the data controller business partner
- ♦ gives yes. In the case of individual entrepreneurs and individuals, directly from the data subject.

3. The are affected scope: The with a data controller contractual in a legal relationship stationary all affected, as well as the data controller natural persons acting on behalf of their business partners.

4. Duration of data management, deadline for data deletion: Data management until the termination of the legal relationship between the data controller and the business partner, or until the statute of limitations in the case of claims.

5. The data to get to know is eligible possible data controllers person, the personal data Recipients : THE personal data may be handled by authorized employees of the data controller, respecting the above principles.

6. The are affected with data management related rights Description :

- ♦ The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and
- ♦ the affected yoga there is the for data portability,
- ♦ Yogi persons on behalf of Acting natural persons they can protest the data handling against.

7. The data subject can initiate access to personal data, their deletion, modification, or limitation of processing, as well as data portability in the following ways :

- ♦ postal on the way the 1191 Budapest, Ullői u. 200 at
- ♦ e-mail through a/that info@ceginformacio.hu e-mail at
- ♦ 0613333000 number.

8. The data handling legal basis :

- ♦ In the case of natural persons acting on behalf of legal entities, Article 6 (1) point f) of the GDPR. Designation of legitimate interest: cooperation, performance of contract, business purpose.
- ♦ Individual entrepreneurs and natural persons in case of: the GDPR 6. article (1) paragraph b) point.
- ♦ THE from a contract resulting demands validation in case of the Civil About the law book solo 2013 yearly V. law 6:21 a.m.
§-the according to 5 years.

6:22 a.m. § [Prescription]

(1) If this law is different does not have, the claims are five expire in a year .

(2) The statute of limitations then it starts when the claim due becomes

(3) The statute of limitations time to change directed agreement into writing must Reserve.

(4) The agreement excluding the limitation period null and void.

9. We inform you, that

- ♦ the data handling the **on contract obsession the data controller**
- ♦ **legitimate for the sake of** is based on. the contact details are provided by the data controller's business partner,
- ♦ the data provision failure to do so

it has the **consequences** that the performance of the contract results from the contract rights practice and obligations fulfillment, furthermore contracting party I'm afraid between cooperation may encounter difficulties.

natural persons case with that the **with consequence walks** _ that no we know contractual enter into a legal relationship .

- the data controller carried out an interest assessment test regarding the handling of the personal data of natural persons acting on behalf of legal entities, as a result of which it was established that the data controller is legitimate with his interest against no they enjoy it priority the affected it's like that interests obsession basic rights and freedoms that would require the protection of personal data.

Cookies _ (cookies) his treatment

1. The so called with "password protected for a session used cookies ", "to shopping cart required cookies ", "safety cookies ", "It's necessary cookies ", "Functional cookies ", and the "website statistics for the use of " cookies responsible for the management " it is not necessary to request prior consent from the data subjects.
2. The data handling the fact the handled data scope: Unique identification number, dates, appointments
3. The are affected scope: THE website visitor all affected.
4. The data handling its goal: THE users identification, visitors trace tracking, to the body tailored operation provision.
5. The data handling duration, the data deletion deadline:

Cookies type	basis for data management	Data handling duration
Session cookies (session) or other cookies that are essential for the operation of the website	Article 6 (1) point f) of the GDPR . The legitimate interest of the data controller a for the purpose of operating the website, ensuring the functionality and basic functions of the website , and the security of the computer system.	The relevant visitors session period until closing
Persistent or saved cookies	Article 6 (1) point f) of the GDPR . The legitimate interest of the data controller a for the purpose of operating the website, ensuring the functionality and basic functions of the website , and the security of the computer system	Data management lasts until the data subject is deleted, or cookies with an exact validity period (permanent, saved) until they are deleted, but they are stored on the computer until their validity period expires at the latest
Statistical, marketing cookies	the GDPR 6. article (1) paragraph the) point	1 month - 2 year

6. The person of the possible data controllers authorized to see the data: The data controller can see the personal data .
7. Description of data processing rights of data subjects: The data subject has the option to delete cookies in the Tools/Settings menu of browsers, usually under the settings of the Data Protection menu item.
8. Most browsers that our users use allow you to set which cookies are saved and allow (certain) cookies to be deleted again. If you limit the saving of cookies on specific websites or do not allow third-party cookies , then in certain circumstances this there can lead that our website any more no can be used complete as a whole. Here find information to that about how you can customize the cookie settings for standard browsers :

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

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

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

Google Ads conversion tracking use

1. the online advertising program called "Google Ads ", and also uses Google's conversion tracking service within its framework. Google conversion tracking is an analytics service of Google Inc. (1600 Amphitheater Parkway , Mountain View , CA 94043, USA; "Google").
2. When User one website Google ad by worth away then one the for conversion tracking required a cookie is placed on your computer. The validity of these cookies is limited and they do not contain any personal data, so the User cannot be identified by them.
3. When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller can see that the User has clicked on the ad.
4. All Google Ads customer another cookies _ gets, like this those the Ads to its customers on their websites across no may trace follow.
5. The informations – which the conversion tracker cookies _ with the help of were obtained – that the goal serve that the Create conversion statistics for your customers who choose Ads conversion tracking. In this way, clients are informed about the number of users who click on their ad and are redirected to a page with a conversion tracking tag. However, they do not get access to information that could identify any user.
6. If you do not want to participate in conversion tracking, you can reject this by disabling the installation of cookies in your browser. After that, you will not be included in the conversion tracking statistics.
7. Further information and Google's privacy statement are available at <https://policies.google.com/privacy>

THE Google Analytics application

1. This the website the Google Analytics application use, which the Google Inc. ("Google") web analyst service. Google Analytics uses so-called " cookies ", text files that are saved on your computer, thus facilitating the analysis of the use of the website visited by the User .
2. by cookies related to the website used by the User is usually sent to and stored on one of Google 's servers in the USA . By activating IP anonymization on the website, Google shortens the User's IP address beforehand within the member states of the European Union or in other states that are parties to the Agreement on the European Economic Area.
3. THE complete as an IP address the Google in the USA being to your server by for transmission and over there to shorten it just in exceptional cases. On behalf of the operator of this website, Google will use this information to that evaluate how used it the User the website, furthermore, that the website to prepare reports related to website activity for its operator, as well as to provide additional services related to website and Internet use.
4. THE Google Analytics within its framework within the User your browser by forwarded IP address no leads together the with other Google data. However, the User can prevent the storage of cookies by setting their browser accordingly we will call you attention, that in this the case it may happen that of this the website no all function will be fully usable. You can also prevent Google from collecting and processing the User's website usage data (including IP address) through cookies by downloading and installing the browser plugin available at the following link . <https://tools.google.com/dlpage/gaoptout?hl=en>

Recipients with whom personal data is communicated

" *recipient* ": the natural or legal person, public authority, agency or any other body to whom or to which the personal data is communicated, regardless of whether it is a third party.

1. Data processors (who, the data controller on behalf of are carried out data management)

The data controller uses data processors in order to facilitate its own data management activities, as well as to fulfill its contractual obligations with the data subject and the obligations imposed by legislation.

The data controller places great emphasis on using only data processors who provide adequate guarantees for the implementation of appropriate technical and organizational measures ensuring compliance with the requirements of the GDPR and the protection of the rights of the data subjects.

The data processor and any person acting under the control of the data processor who has access to personal data shall handle the personal data contained in these regulations exclusively in accordance with the instructions of the data controller.

The data controller is legally responsible for the activities of the data processor. The data processor is only liable in that

case with responsibility the data handling by caused for damages, if no held in the in GDPR defined, especially the obligations imposed on the data processors, or if you ignored the legal instructions of the data controller or acted contrary to them.

The data processor the data treatment tangentially meritorious decision making is not.

The data controller can use a storage service provider to provide the IT background, and a courier service as a data processor to deliver the ordered products.

2. Data processors

Data processors activity	Name, address, contact information
Hosting service	<p>RACKFOREST IT COMMERCIAL SERVICE PROVIDER AND CONSULTANT Ltd. 1132 Budapest, Victor Hugo u. 18-22., 3. em.</p>
Other data processor (e.g. online invoicing, web development, marketing)	<p>Accounting : Mode Ltd. 1087 Budapest, Könyves Kálmán Krt. 76.</p> <p>Audit : Company value Ltd. 1222 Budapest, Zsineg u. 24.</p> <p>System administrator activity : Késmárki Szoftverfálzező Kft. 1068 Budapest, Benczúr u. 47.</p> <p>Preparation of accounts and statistics : Dpont Bt. 1213 Budapest, Vitorlás u. 26.</p> <p>Mail : Magyar Posta Zrt. 1138 Budapest, Dunavirág utca 2-6.</p> <p>Billing : Billingo Technologies Ltd. 1133 Budapest, Árbóc utca 6.</p> <p>Statistical data collection : Actual 77 Media Kft. 1202 Budapest, Throat street 14th, Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Ireland</p> <p>Server service : Servergarden Kft., Address of Server Rooms: XIII. district 1132 Budapest, Victor Hugo u. 18-22., 2nd floor, info@servergarden.hu, phone: 06-1-432-3133</p>

" *third party* ": the the natural obsession yogi person, public authority body, agency obsession any other body, which is not the same as the data subject, the data manager, the data processor or the persons who have been authorized to process personal data under the direct control of the data manager or data processor.

3. Data transfer third afraid for

THE third afraid data controllers the own on their behalf, the own data protection their rules appropriately is treated the by us provided personal data.

Data controller activity	Name, address, contact information
Online payment	
	OTP Mobile Ltd. 1143 Budapest, Hungary crt.
	17-19.ugyfelszolgalat@simple.hu
	The Simple Pay Online Payment System is developed and operated by OTP Mobil Kft. OTP Mobil Kft. the OTP Group member. THE service customers can choose in the case of online purchases the SimplePay simple and secure payment solution. At the usual way they can make their payment on the SimplePay interface.
	with SimplePay by payment in case of I acknowledge, that the) Céginformáció.hu Ltd. (Users of https://www.crefoport.hu/ and www.ceginformacio.hu by data controller , 1191 Budapest, Üllői u. 200 stored in its database below personal my datas for delivery are sent to OTP Mobil Kft. as a data processor. The data controller by forwarded data circle the following:
	Name Country
	Postal code Settlement Title
	E-mail title
The nature and purpose of the data processing activity carried out by the data processor can be found in the SimplePay Data Management Information Sheet at the following link: http://simplepay.hu/vasarlo-aff	

Community pages

1. The fact of the data collection, the scope of the processed data: Meta / Twitter / Pinterest / Youtube / Instagram etc. the name registered on social networking sites and the user's public profile picture.
2. The are affected scope: All affected, who registered the Meta / Twitter / Pinterest / Youtube / Instagram etc. on social media sites, and "liked" the Service provider communal side, respectively the communal page across picked up the contact with the data controller.
3. Purpose of data collection: Sharing, "liking", following and promoting certain content elements, products, promotions or the website itself on social media sites.
4. The duration of the data management, the deadline for deleting the data, the possible data controllers entitled to

access the data person and the are affected with data management related rights Description: The data about its source, The person concerned can find out about their management, the method of transfer and its legal basis on the given social page. Data management the communal pages is realized and like this the data handling for the duration of in a way respectively the data its deletion and modification options are subject to the regulations of the given social site.

5. The data handling legal basis: the affected voluntary contribution personal data for treatment the communal pages.

Customer relations and other data management

1. If a question arises or the person concerned has a problem while using our data management services, the website specified ways (phone, e-mail, communal pages etc.) contact can step the with a data controller.
2. Data controller the has arrived emails, messages, phone, On Meta etc. specified data the interested with his name and e-mail with the address as well as other, voluntarily specified personal with your data together the from data communication it mattered at most Deletes after 2 years.
3. E information sheet up no listed about data management the data upon admission we give information.
4. The Service Provider is obliged to provide information, communicate and transfer data, and make documents available in the event of an exceptional official inquiry, or in the event of an inquiry by other bodies based on the authorization of the law.
5. THE Service provider on this cases the seeker for – if the the accurate goal and the data circle marked it - discloses personal data only to the extent and to the extent that is absolutely necessary to achieve the purpose of the request.

The rights of data subjects

1. THE access yoga

You are entitled to receive feedback from the data controller that your personal data is being processed is there and if such data handling in progress there is is eligible to that the personal for data and the get access to the information listed in the regulation.

2. THE for correction it's real law

You have the right to request that the data controller correct inaccurate personal data concerning you without undue delay. Taking into account the purpose of data management, you are entitled to request the completion of incomplete personal data, including by means of a supplementary statement.

3. THE to delete it's real law

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

4. The to oblivion it's real law

If the data controller public brought the personal data, and that delete obliged to the available technology and the implementation costs taking into account will do the reasonably expected steps – including technical measures – in order to inform the data controllers handling the data that you have requested the deletion of the links to the personal data in question or the copy or duplicate of this personal data.

5. The data handling to limit it's real law

you is eligible to that at your request the data controller limits the data management, if the below conditions one of them is fulfilled:

- you disputes the personal data accuracy, this case the restriction to that the for a period of time applies to which enables the controller to check the accuracy of personal data;
- the data handling unlawful, and you opposes the data deletion, and instead asks for those of its use limitation;
- the data controller already there is none need the personal to data data handling for the purpose of but you requires those yogi to submit, enforce or defend claims;
- You have objected to data processing; in this case, the limitation applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over your legitimate reasons.

6. The for data portability it's real law

You have the right to receive the personal data you have provided to a data controller in a segmented, widely used, machine-readable format, and you are also entitled to have this data transferred to another data controller forward it without that, that this would hinder the the data manager, of which the personal data the made available (...)

7. THE to protest it's real law

THE legitimate for the sake of respectively the public authority on a driver's license, as on legal grounds based on data management case you is eligible to the own with his situation related for reasons anytime protest personal of your data the (...) his treatment against, including also profiling based on the aforementioned provisions.

8. Protest direct business acquisition in the evening

If the personal data his treatment direct business acquisition in order to happens you is eligible to that anytime protest to you concerning personal data e purpose by his treatment against, including the profiling also if the the is related to direct business acquisition. If you object to the processing of personal data for direct business purposes, then the personal data may no longer be processed for this purpose.

9. Automated decision making unique cases, including the profiling

you is eligible to that not spread Who to you the such exclusively automated on data management – including the profiling too - the scope of the decision based on which would have a legal effect on you or would similarly affect you to a significant extent.

The previous paragraph no applicable in that the in case if the decision:

- ♦ you and the data controller between contract binding obsession fulfillment in order to required;
- ♦ making it the data controller applicable it's like that EU obsession member state law do enable which you rights and establishes appropriate measures for the protection of his freedoms and legitimate interests; obsession
- ♦ you expressed on his consent is based on.

Action deadline

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

Need in case of this **2 month can be extended** . THE deadline extension the data controller the delay will inform you **within 1 month** of receiving the request, indicating the reasons .

If the data controller does not take measures following your request, **it will inform you without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action** , as well as the fact that you can file a complaint with a supervisory authority and exercise your right to judicial redress.

The security of data management

The data controller and the data processor the science and technology position and the implementation costs, furthermore the taking into account the nature, scope, circumstances and purposes of data processing, as well as the varying probability and severity of the risk to the rights and freedoms of natural persons, it implements appropriate technical and organizational measures in order to that the risk measure appropriate level data security guarantees including, are more between, where appropriate :

1. the personal data his pseudonym and encryption;
2. the personal data for treatment used systems and services continuous confidential of its nature its security, integrity, availability and resilience;
3. physical obsession technical incident in case of the to that it's real ability, that the personal for data it's real access and the availability of the data can be restored in due time;
4. a procedure for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures taken to guarantee the security of data management.
5. The processed data must be stored in such a way that unauthorized persons cannot access them. In the case of paper-based data carriers , by establishing the order of physical storage and filing , in the case of data handled in electronic form, by using a central rights management system.
6. The data IT method by storage way business must to choose that those deletion – the possibly also with regard to

a different erasure deadline - it can be carried out at the end of the data erasure deadline, or if necessary for other reasons. The deletion must be irreversible.

7. Paper-based data carriers must be stripped of personal data using a document shredder or an external organization specialized in document destruction. In the case of electronic data carriers, physical destruction must be ensured in accordance with the rules for the disposal of electronic data carriers, and need according to in advance the data the safe and irreversible deletion.
8. The data controller the below specific data security measures do:

In order to ensure the security of personal data handled on a paper basis, the Service Provider applies the following measures (*physical protection*):

1. THE documents safe, well can be closed dry in the room to place away.
2. If the on paper handled personal data digitization costs beer, then the digitally governing rules for stored documents must be applied
3. During the course of his work, the employee of the Service Provider performing data management may only leave the room where data management is taking place by blocking the data carriers entrusted to him or by closing the given room.
4. THE personal data just the to that is eligible persons they may know and to those third persons they cannot access it.
5. THE Service provider building and premises fire protection and asset protection with equipment are provided.

IT protection

1. The data handling during used computers and mobile tools (other data carriers) the Service provider are his property .
2. THE Service provider by used personal data containing computerized system with virus protection there is provided.
3. THE digitally stored data safety in order to the Service provider data backups and archiving applies.
4. THE central server for machine just appropriate with authorization and only the to that designated persons they can fit to it.
5. THE on computers is located for data with username and with a password may just to access.

The information to the affected party of data protection incident

If the data protection incident is likely to involve a high risk for the rights and freedoms of natural persons, the data controller shall inform the data subject without undue delay.

In the information provided to the data subject, the nature of the data protection incident must be **clearly and comprehensibly** described , and the name and contact information of the data protection officer or other contact person providing additional information must be provided; the likely consequences of the data protection incident must be described; must be explained by the data controller data protection incident for remedy deed obsession designed measures, including given case the data protection measures aimed at mitigating any adverse consequences resulting from the incident.

The concerned no must to inform, if the following conditions any of them is fulfilled:

- the data controller **has implemented appropriate technical and organizational protection measures** , and these measures have been applied to the data affected by the data protection incident, in particular those measures - such as the use of encryption - that **make the personal data unintelligible to persons not authorized to access the personal data data;**
- the data controller the data protection incident following it's like that further measures deed, which **ensure that the high risk to the rights and freedoms of the data subject is unlikely to continue is realized** ;
- providing information **would require a disproportionate effort** . In such cases, the data subjects must be informed through publicly published information, or a similar measure must be taken that ensures similarly effective information to the data subjects.

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

Privacy incident announcement the authority

The data protection incident the data controller unjustified delay without, and if possible, at the latest 72 with an hour then, notify the competent supervisory authority pursuant to Article 55 that the data protection incident has come to his

attention, unless the data protection incident probably no goes with risk the natural persons rights and freedoms looking at. If the notification is not made within 72 hours, the reasons justifying the delay must also be attached.

in case of mandatory data management

If the duration of mandatory data management or the periodic review of its necessity is stipulated by law, local government decree, or the European Union obligatory act no determines and **the data controller the data handling reviews at least every three years from the start of its operation** whether the processing of personal data handled by it or by a data processor acting on its behalf or at its direction **is necessary for the realization of the purpose of data processing** .

The data controller **documents the circumstances and results of this review, keeps this documentation for ten years after the review has been completed** and makes it available to the Authority at the request of the National Data Protection and Freedom of Information Authority (hereinafter: the Authority).

Complaining possibility

The data controller contingent infringement against with a complaint the National Privacy and Freedom of information In authority may to live:

National Privacy and Freedom of Information Authority

1055 Budapest, Falk Miska street 9-11 .

Correspondence title: 1363 Budapest, Pf. 9.

Phone: +36 -1-391- 1400

Fax: + 36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Final word

THE information sheet preparation during with attention we're the below to legislation:

- ♦ On the protection of natural persons with regard to the management of personal data and such data is free about the flow, as well as the 95/46/EC decree in force outside placement (general data protection decree) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (GDPR) (April 27, 2016);
- ♦ CXII of 2011 Act - on the right to self-determination of information and freedom of information (hereinafter: Infotv.);
- ♦ CVIII of 2001 Act - on certain issues of electronic commercial services and services related to the information society (mainly § 13/A);
- ♦ 2008 yearly XLVII. law – the with consumers opposite unfair trade exercise about its prohibition;
- ♦ 2008 yearly XLVIII. law – the economic advertising activity basic conditions and some about its limitations (esp § 6);
- ♦ 2005 yearly XC. law the electronic on freedom of information;
- ♦ 2003 yearly C. law the electronic about communication (especially the §155);
- ♦ 16/2011. s. opinion on behavioral online advertising about the EASA/ IA Recommendation regarding its best practice ;
- ♦ THE National Privacy and Freedom of information Authorities recommendation the preliminary information on its data protection requirements.