



## **DATA PROTECTION**

## DATA HANDLER'S INFORMATION:

<b>Company name:</b>	BIOLA Biokozmetikai Fejlesztő Gyártó Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság /BIOLA ORGANIC COSMETICS Ltd.
<b>Headquarters:</b>	<b>6000 Kecskemét, Szivárvány st. 8</b>
Company registration number:	<b>03-09-115021</b>
<b>Tax number:</b>	<b>14038675-2-03</b>
<b>Represented by:</b>	<b>dr. Gyovai Viola ügyvezető</b>
<b>E-mail:</b>	<a href="mailto:info@biola.hu">info@biola.hu</a>

In accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (General Data Protection Regulation), we hereby provide the following information. This data protection notice governs the data processing of the following sites:

<https://biolacosmetics.com/>

<https://professional.biolacosmetics.com/>

Information about data protection can be read on the following link:

<https://biolacosmetics.com/>

## DEFINITIONS

- a) **personal data**: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- b) **data handler**: any operation or set of operations which is performed on personal data or data files, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- c) **data controller**: the natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law.
- d) **data processor**: the natural or legal person, public authority, agency or any other body which processes personal data on behalf of the data controller.
- e) **recipient**: the natural or legal person, public authority, agency or any other body to which personal data are disclosed, whether or not a third party. Public authorities which have access to personal data in the context of a specific investigation in accordance with Union or Member State law shall not be considered recipients; the processing of such data by such public authorities shall be in accordance with the applicable data protection rules in accordance with the purposes of the processing.
- f) **third party**: a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct control of the controller or processor, are authorised to process personal data.
- g) **record keeping system**: a file of personal data structured in any way – centralized, decentralized or according to functional or geographical aspects – which is accessible based on specific criteria.
- h) **data breach**: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored, or otherwise processed.

- i) **representative:** a natural or legal person established or resident in the European Union and designated in writing by the controller or processor pursuant to Article 27, who represents the controller or processor in relation to the obligations incumbent on the controller or processor under this Regulation.
- j) **undertaking:** a natural or legal person engaged in an economic activity, regardless of its legal form, including partnerships and associations engaged in regular economic activities.

## PRINCIPLES OF DATA PROCESSING

### 1. Lawfulness, fairness and transparency

The company processes data lawfully and fairly and in a manner that is transparent to the data subject (lawfulness, fairness and transparency).

### 2. Limited to purpose

The company collects personal data only for specified, explicit and legitimate purposes and does not process them in a manner that is incompatible with those purposes (purpose limitation).

### 3. Data minimalization

The company processes data in a manner that is appropriate and relevant to its purpose(s) and limited to what is necessary (data minimalization). Accordingly, the company does not collect or store more data than is strictly necessary for the purpose of data processing.

### 4. Accuracy

The company processes data accurately and up-to-date. The company takes all reasonable steps to ensure that personal data that are inaccurate in relation to the purposes of the processing are erased or rectified without delay (accuracy).

### 5. Limited storage capacity

The company stores personal data in a form that permits identification of data subjects only for the time necessary to achieve the purposes of processing the personal data, subject to the storage obligation specified in the applicable legislation (limited storage).

### 6. Integrity and confidentiality

The company ensures adequate security of personal data by applying appropriate technical or organizational measures, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage to personal data (integrity and confidentiality).

### 7. Accountability

The company is responsible for compliance with the principles detailed above, and the company demonstrates this compliance (accountability). Accordingly, the company ensures the ongoing enforcement of the provisions of this internal regulation, the continuous review of its data processing and, if necessary, the modification and supplementation of data processing procedures. The company prepares documentation to demonstrate compliance with legal obligations.

## 8. „Privacy by design“

A very conscious data protection mindset, which very briefly means that both when determining the method of data processing and during data processing, the Data Controller implements appropriate technical and organizational measures – such as pseudonymization – with the aim of effectively implementing the above principles, fulfilling obligations, incorporating legal guarantees, etc., and does all of this in a regulated and detailed documented manner. In practice, the mindset is facilitated by employee training, data protection awareness, and impact assessments, risk analyses, and balancing of interests tests used during the introduction and/or regular review of individual data processing operations.

## DATA PROCESSING

### 1. The <https://biolacosmetics.com/> and <https://professional.biolacosmetics.com/> contact page

The fact of data collection, the scope of data processed and the purpose of data processing	
Purpose of data collection	<p>The purpose of processing personal data provided on the contact details provided under the CONTACT menu item in the footer of the website is:</p> <ul style="list-style-type: none"><li>- to make contact, answer questions,</li><li>- to maintain contact with existing customers,</li><li>- to make offers and provide related information, facilitate the conclusion of contracts,</li><li>- to submit complaints and investigate them,</li><li>- to apply for a job offer. The website offers the possibility to complete various educational tests, where the purpose of processing personal data provided is:</li><li>- to provide information and clarification following the consideration of the tests.</li></ul>
Scope of personal data processed	<p>The scope of personal data processed in the context of contact is consistent with the content of the request, such as name, e-mail address, telephone number, other comments (“message”), date of request.</p> <p>E-mail address: In order to contact you, it is not necessary for the e-mail address to contain personal data.</p> <p>Name: Identification of the data subject</p>

Information regarding data processing	
<b>The scope of the affected parties:</b>	All users who contact us through the website.
<b>Duration of data processing, deadline for data deletion</b>	<p>Data processing extends <b>until the question specified in the subject of the contact is answered</b>, until the received requests are closed or for the period necessary for the purpose of data processing. <i>If a civil law contract is concluded between the Data Controller and the data subject through contact, the data processing according to the concluded contract shall be applicable.</i></p> <p>At the request of the data subject, the Data Controller shall immediately take action on deletion. In the event of the data subject's unavailability for more than 30 days, previously recorded personal data will be deleted.</p>
<b>The identity of potential data controllers authorized to access the data, recipients of personal data:</b>	The data controller will access and process personal data in compliance with the above principles. Only the Data Controller's colleagues and the Data Processor specified in this information will have access to the personal data.
<b>Description of the rights of data subjects in relation to data processing:</b>	The data subject may request from the data controller access to personal data concerning him or her, rectification, erasure or restriction of processing, and object to the processing of such personal data, and the data subject has the right to data portability and the right to withdraw consent at any time.
<b>The data subject can request access to personal data, deletion, modification or restriction of processing, data portability, and objection to data processing in the following ways:</b>	E-mail: <a href="mailto:info@biola.hu">info@biola.hu</a>
<b>Legal basis for data processing:</b>	<b>Consent of the data subject</b> , Article 6(1)(a), Section 5(1) of the Privacy Act.
<b>Information:</b>	We inform you that data processing is based on your consent.

**2. The registration on <https://biolacosmetics.com/registration> and <https://professional.biolacosmetics.com/registration> websites**

<b>The fact of data collection, the scope of data processed and the purpose of data processing</b>	
<b>Purpose of data management:</b>	<p>The products provided on the websites operated by the Data Controller can be used by registered users, which can be accessed under the LOGIN - REGISTRATION menu item of the website.</p> <p>The primary purpose of registration is to provide convenience services:</p> <ul style="list-style-type: none"> <li>• facilitating the processing of orders by automatically accessing the service even when logging in to the website,</li> <li>• storing data on previous orders,</li> <li>• displaying possible special offers for registered users.</li> </ul>
<b>Scope of personal data processed</b>	<p>Data provided upon registration:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address (email address does not need to contain personal data)</li> <li>• Password In the case of a partner account:</li> <li>• Name</li> <li>• Email address (email address does not need to contain personal data)</li> <li>• Password</li> <li>• Phone number</li> <li>• Billing data</li> </ul> <p>The data controller stores imprints of the password that is only suitable for checking the correctness of the password, but the password itself cannot be recovered from it.</p>
<b>Information regarding data processing</b>	
<b>Scope of data subjects:</b>	All users who register on the website.
<b>Duration of data processing, deadline for data deletion:</b>	<p>We will process your data provided during registration and generated during the use of your account until your registration is deleted. After deletion, we will store the date of deletion and your email address in order to be able to prove the fact of your registration being deleted, but we will not use your data in any other way.</p>
<b>The identity of potential data controllers authorized to access the data, recipients of personal data</b>	The data controller obtains and processes personal data in compliance with the above principles. Only colleagues of the Data Controller have access to personal data.

<b>Description of the rights of data subjects in relation to data processing:</b>	The data subject may request from the data controller access to personal data concerning him or her, rectification, erasure or restriction of processing, and may object to the processing of such personal data, and the data subject has the right to data portability and the right to withdraw consent at any time.
<b>The data subject can request access to personal data, deletion, modification or restriction of processing, data portability, and objection to data processing in the following ways:</b>	E-mail: <a href="mailto:info@biola.hu">info@biola.hu</a>
<b>Legal basis for data processing</b>	<b>Consent of the data subject</b> , Article 6(1)(a), Section 5(1) of the Privacy Act.
<b>Information</b>	We would like to inform you that data processing is based on your consent. If you withdraw your consent or do not provide your data, we will not be able to finalize your registration or provide registration-related functions.

**3. The orders and purchases placed on <https://biolacosmetics.com/> and <https://professional.biolacosmetics.com/> websites**

<b>The fact of data collection, the scope of data processed and the purpose of data processing</b>	
Purpose of data management:	The Data Controller provides its users with the service of ordering cosmetic products on a website operated by the Data Controller, information and information related to the use of cosmetic products and cosmetic awareness, within the framework of which the user can initiate an order from the product list offered by the Data Controller, contact the Data Controller regarding their order, modify and manage their order, delete it, make a complaint regarding their order, and collect information and information on the website operated by the Data Controller. The Data Controller may only use the product ordering services provided on the website operated by it to registered users.



<p>Scope of personal data processed</p>	<p>The data provided during registration:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address (in the case of an email address, it is not necessary to contain personal data)</li> <li>• Password</li> <li>• Billing data</li> <li>• Shipping data</li> </ul> <p>In the case of a partner account:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address (in the case of an email address, it is not necessary to contain personal data)</li> <li>• Password</li> <li>• Phone number</li> <li>• Billing data</li> <li>• Shipping data</li> </ul> <p>The data controller stores imprints of the password, which is only suitable for checking the correctness of the password, but the password itself cannot be recovered from it.</p>
<p><b>Information regarding data processing</b></p>	
<p><b>Scope of data subjects</b></p>	<p>All users who have submitted an order request to the Data Controller.</p>
<p><b>Duration of data processing, deadline for data deletion</b></p>	<p>We process your data provided upon registration and generated during the use of your account until the registration is deleted.</p> <p>After deletion, we will store the date of the deletion and your e-mail address in order to prove the fact of the registration being deleted, but we will not use your data in any other way.</p> <p>By placing a user order and its acceptance by the Data Controller (Service Provider), a so-called electronic contract is created, and we will process your data affected by the contract for 5 years from the conclusion of the contract, while your billing data, including data related to tax regulations, in order to fulfill accounting obligations, according to Section 169 of Act C of 2000, until the end of the 8th year.</p> <p>Consumer protection complaints are stored until the end of the 3rd year from their creation.</p>

	If the User interrupts the purchase process and does not order the product/service placed in the cart, BIOLA Biokozmetikai Kft. will send a reminder to the Customer by e-mail within 1 calendar day after the interruption of the process, if the product desired to be ordered is still in stock.
<b>The identity of potential data controllers authorized to access the data, recipients of personal data</b>	The data controller obtains and processes personal data in compliance with the above principles. Only colleagues of the Data Controller have access to personal data.
<b>Description of the rights of data subjects in relation to data processing</b>	The data subject may request from the data controller access to personal data concerning him or her, rectification, erasure or restriction of processing, and may object to the processing of such personal data, and the data subject has the right to data portability and the right to withdraw consent at any time.
<b>The data subject can request access to personal data, deletion, modification or restriction of processing, data portability, and objection to data processing in the following ways:</b>	E-mail: <a href="mailto:info@biola.hu">info@biola.hu</a>
<b>Legal basis for data processing</b>	The data controller processes the data in order to conclude a contract (order) containing the details of the provision of the service and to fulfill its contents, based on Article 6, point 1) b) of the Regulation.

**4. Newsletters related to or from <https://biolacosmetics.com/> and <https://professional.biolacosmetics.com/> website**

<b>The fact of data collection, the scope of the data processed and the purpose of data processing</b>	
We inform you that the User may give prior and express consent to the Data Controller contacting him/her with advertising offers and other communications at the contact details provided upon registration. The User, bearing in mind the provisions of this information, may consent to the Data Controller processing his/her personal data necessary for sending advertising offers. The Data Controller will not send unsolicited advertising messages, and the User may unsubscribe from receiving offers free of charge, without restriction or justification. In this case, the Data Controller will delete all personal data - necessary for sending advertising messages - from its records and will not contact the User with further advertising offers. The User may unsubscribe from advertisements by clicking on the link in the message.	
Name and e-mail address.	Identification, enabling subscription to the newsletter.
<b>Information regarding data processing</b>	
Scope of data subjects	All data subjects who subscribe to the newsletter.

Duration of data processing, deadline for data deletion	Data processing continues until the consent is withdrawn, i.e. until the user unsubscribes.
Purpose of data processing:	Sending electronic messages (e-mail) containing news, professional content, promotions, events to the data subject, providing information about current information, products, promotions, new features, etc.
Potential data controllers authorized to view the data, recipients of personal data	Personal data may be processed by the Data Controller's employees, in compliance with the above principles.
Description of the rights of data subjects in relation to data processing	<ul style="list-style-type: none"> <li>• The data subject may request from the data controller access to, rectification, erasure or restriction of processing of personal data concerning him or her, and</li> <li>• may object to the processing of such personal data, and</li> <li>• the data subject has the right to data portability and the right to withdraw consent at any time.</li> </ul>
The data subject can request access to personal data, deletion, modification or restriction of processing, data portability, and objection to data processing in the following ways:	E-mail: <a href="mailto:info@biola.hu">info@biola.hu</a>
Legal basis for data processing	Consent of the data subject, Article 6(1)(a), Section 5(1) of the Information Act, and Section 6(5) of Act XLVIII of 2008 on the basic conditions and certain limitations of commercial advertising activities
Information	We would like to inform you that the data processing is based on your consent. The data subject may unsubscribe from the newsletter at any time, free of charge.
<b>Data processor used by the data controller:</b>	<p><b>Hosting provider:</b> Magyar Telekom Nyrt – Data park</p> <p><b>Domain provider:</b> Magyar Telekom Nyrt – Domain group</p> <p><b>Hírlevél küldése:</b> BITHUSZÁROK Számítástechnikai és Szolgáltató Betéti Társaság</p>

## 5. Using Google Ads conversion tracking

The data controller uses the online advertising program called "Google Ads" and, within its framework, uses Google's conversion tracking service. Google conversion tracking is an analytics service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When a User accesses a website via a Google ad, a cookie required for conversion tracking is placed on their computer. These cookies have a limited validity and do not contain any personal data, so the User cannot be identified by them.

When the User browses certain pages of the website and the cookie has not yet expired, both Google and the data controller can see that the User clicked on the advertisement. Individual users and data subjects cannot be identified from the mass of users, so no personal data is processed.

Each Google Ads customer receives a different cookie, so they cannot be tracked across Ads customers' websites.

The information – obtained using conversion tracking cookies – is used to compile conversion statistics for Ads customers who have opted for conversion tracking.

This allows customers to see how many users clicked on their ads and were redirected to a page with a conversion tracking tag. However, they do not receive any information that could identify any individual user.

If you do not wish to participate in conversion tracking, you can refuse to participate by disabling the installation of cookies in your browser. You will then not be included in the conversion tracking statistics.

## 6. Using "Google Analytics"

The Data Controller's website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer to help the User analyze how the website is used.

The information generated by the cookie about the website used by the User is usually transferred to and stored on a Google server in the USA. If IP anonymization is activated on the website, Google will shorten the User's IP address within the member states of the European Union or in other states party to the Agreement on the European Economic Area upon arrival at the server, but before it is stored in the backend.

The full IP address will only be transmitted to a Google server in the USA and shortened there in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the user uses the website, to compile reports on website activity for the website operator and to provide other services relating to website and internet usage.

Within the framework of Google Analytics, the IP address transmitted by the User's browser will not be merged with other data held by Google. The User can prevent the storage of cookies by setting their browser accordingly, however, we would like to point out that in this case not all

functions of this website may be fully usable. You can also prevent Google from collecting and processing the data generated by the cookie about the User's use of the website (including the IP address).

## 7. Use of cookies

The fact of data collection, the scope of data processed and the purpose of data processing	
Unique identification number, dates, times	Identification of users and tracking of visitors.
Information on data processing	
<b>Scope of data subjects</b>	All data subjects visiting the website.
Purpose of data processing	Identifying users and tracking visitors.
<b>Duration of data processing, deadline for data deletion</b>	Until the end of the relevant visitor session or for two years according to the regulations issued by Google Analytics.
<b>Potential data controllers authorized to view the data, recipients of personal data</b>	Potential data controllers authorized to view the data, recipients of personal data
<b>Description of the rights of data subjects related to data processing</b>	The data subject has the option to delete cookies in the Tools/Settings menu of the browsers, usually under the settings of the Privacy menu item.
<b>Legal basis for data processing</b>	The consent of the data subject is not required if the sole purpose of using cookies is to transmit information via an electronic communications network or if the service provider absolutely needs it to provide an information society service explicitly requested by the subscriber or user.

## 8. Social media

The fact of data collection, the scope of data processed and the purpose of data processing	
Facebook/Google+/Instagram/LinkedIn etc. registered name or public profile picture of the user on social media sites.	Promoting, sharing, "liking" or "following" certain content elements, services, results of the website, or the website itself on social media. The company's job advertisements are also available on the Facebook social media site.
Information regarding data processing	
<b>Scope of data subjects</b>	All data subjects who have registered on social media and have "liked" or "followed" the website.

Purpose of data processing:	Promoting, sharing, "liking" and "following" certain content elements, services, results of the website and the business, or the website itself, on social media.
<b>Duration of data processing, deadline for data deletion</b>	Duration of data management, deadline for data deletion, possible data controllers authorized to view the data and description of the data subjects' rights related to data management: The data subject can find out about the source of the data, its management, the method of transfer and its legal basis on the given social media site. Data management is carried out on social media sites, so the duration, method of data management and the possibilities for data deletion and modification are subject to the regulations of the given social media site.
<b>Az adatkezelés jogalapja</b>	Az érintett önkéntes hozzájárulása személyes adatai kezeléséhez a közösségi oldalakon.

## Hosting and Security

We strive for security in our data management and use of our computer systems.

Our corporate governance system (Eurostone) developer: SW Stúdió Kft. sws@sws.hu

Development and monitoring of our website: www.weboldalnet.hu

Webshop server hardware: <https://www.telekom.hu/uzleti/szolgaltatasok/biztonsag-adatparki-megoldasok>

## Hosting service

1. Activities performed by the data processor: Hosting service
2. Name and data processor: Magyar Telekom Nyrt – Data park
3. The fact of data processing, the scope of data processed: All personal data provided by the data subject.
4. The scope of data subjects: All data subjects using the website.
5. The purpose of data processing: Making the website accessible and operating it properly.
6. The duration of data processing, the deadline for data deletion: Data processing lasts until the termination of the agreement between the data controller and the hosting service provider, or until the data subject submits a request for deletion to the hosting service provider.
7. The legal basis for data processing: the User's consent, Section 5 (1), Article 6 (1) a) of the Infotv., and Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society.

## Website operator

1. Activity performed by the data processor: website operation
2. Name and contact details of the data processor:

## **Weboldalnet IT Ltd.**

3400 Mezőkövesd, Jázmin street 51

Company registration number: 05-09-033395

Tax number: 28824640-2-05

3. The fact of data processing, the scope of data processed: Personal data provided by the data controller.
4. The scope of data subjects: Employees, members, partners of the data controller.
5. The purpose of data processing: website operation, maintenance.
6. Duration of data processing, deadline for data deletion: Data processing lasts until the termination of the agreement between the data controller and the operator, or until the data subject requests deletion.
7. Legal basis for data processing: the User's consent, Section 5 (1), Article 6 (1) a) of the Infotv.

## **NEWSLETTER SENDING**

1. Activity performed by the data processor: sending newsletters in line with the data controller's marketing activities
2. Name and contact details of the data processor:

BITHUSZÁROK Számítástechnikai és Szolgáltató Betéti Társaság

2051 Biatorbágy, Damjanich street 8. attic 4

Company registration number: 13-06-065996

Tax number: 21158218-2-13

3. The fact of data processing, the scope of data processed: Personal data provided by the data controller.
4. The scope of data subjects: Employees, members, partners of the data controller.
5. Purpose of data processing: sending a newsletter to users who have subscribed to the newsletter
6. Duration of data processing, deadline for data deletion: Data processing lasts until the termination of the agreement between the data controller and the operator, or until the data subject requests deletion.
7. Legal basis for data processing: User's consent, Section 5 (1), Article 6 (1) a) of the Infotv.

## **LEGAL REMEDIES**

The data subject may request information about the processing of his or her personal data, and may request the correction of his or her personal data, or - with the exception of mandatory data processing - the deletion, withdrawal, restriction of data processing, and may exercise his or her right to data portability and objection in the manner indicated when recording the data, or through the data controller's customer service.

## **RIGHT TO INFORMATION**

At the request of the data subject, the Data Controller shall take appropriate measures to provide the data subject with all information referred to in Articles 13 and 14 of the GDPR and all information pursuant to Articles 15 to 22 and 34 in a concise, transparent, intelligible and easily accessible form, in clear and plain language.

## **Right of access of the data subject**

The data subject shall have the right to obtain from the controller information as to whether or not personal data concerning him or her are being processed and, where such processing is taking place, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- the envisaged period for which the personal data will be stored;
- the right to rectification, erasure or restriction of processing and to object;
- the right to lodge a complaint with a supervisory authority;
- information on the sources of the data;
- the fact of automated decision-making, including profiling, as well as intelligible information on the logic involved and the significance and foreseeable consequences of such processing for the data subject.

In the event of the transfer of personal data to a third country or an international organisation, the data subject shall have the right to be informed of the appropriate safeguards for the transfer. The controller shall provide the data subject with a copy of the personal data subject to the processing. For any additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

At the request of the data subject, the data controller shall provide the information in electronic form.

Upon request, the data subject may also be provided with information orally, following credible verification and identification of his or her identity.

## **Right to rectification**

The controller shall rectify personal data if they are inaccurate and accurate personal data are available to it.

## **Right to erasure**

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

- the data subject withdraws his or her consent to the processing and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been processed unlawfully;
- the personal data must be erased for compliance with a legal obligation to which the controller is subject under Union or Member State law;
- the personal data were collected in connection with the provision of information society services.



The erasure of data cannot be initiated if the processing is necessary:

- for the exercise of the right to freedom of expression and information;
- for compliance with an obligation to process personal data under Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for public health purposes, or for archiving, scientific and historical research purposes or statistical purposes, in the public interest;
- or for the establishment, exercise or defence of legal claims.

### **Right to restriction of processing**

At the request of the data subject, the Controller shall restrict the processing of the personal data where one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction shall apply for a period enabling the accuracy of the personal data to be verified;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the data controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing; in which case the restriction shall apply for a period of time until it is determined whether the legitimate grounds of the controller override those of the data subject.

If processing is subject to restrictions, personal data may only be processed, with the exception of storage, with the consent of the data subject, 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 important public interests of the Union or of a Member State. The controller shall inform the data subject in advance of the lifting of the restriction on processing.

### **Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format and to transmit those data to another controller.

### **Right to object**

The data subject shall have the right, on grounds relating to his or her particular situation, to object at any time to processing of personal data concerning him or her for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or to processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions.

In the event of an objection, the controller shall no longer process the personal data unless there are compelling legitimate grounds for doing so which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

Where the personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes, including profiling where such processing is related to direct marketing. In the event of

an objection to the processing of personal data for direct marketing purposes, the data shall not be processed by the controller for such purposes.

### **Automated decision-making in individual cases, including profiling**

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right shall not apply where the processing is necessary for entering into, or the performance of, a contract between the data subject and the data controller; is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or is based on the data subject's explicit consent.

### **Right of withdrawal**

The data subject has the right to withdraw his/her consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

### **Procedural rules**

The controller shall inform the data subject without undue delay, and in any event not later than one month from the date of receipt of the request, of the action taken on the request pursuant to Articles 15 to 22 of the GDPR. Where necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further two months.

The controller shall inform the data subject of the extension of the period, stating the reasons for the delay, within one month from the date of receipt of the request. If the data subject has submitted the request electronically, the information shall be provided electronically, unless the data subject otherwise requests.

If the data controller does not take action on the data subject's request, the controller shall inform the data subject without undue delay, and in any event not later than one month from the date of receipt of the request, of the reasons for not taking action and of the right to lodge a complaint with a supervisory authority and to exercise the right to a judicial remedy.

The controller shall provide the requested information and communication free of charge. If the data subject's request is manifestly unfounded or, in particular, excessive due to its repetitive nature, the controller may charge a reasonable fee, taking into account the administrative costs of providing the requested information or communication or taking the requested action, or may refuse to act on the request.

The controller shall inform any recipient to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing made by it, unless this proves impossible or involves a disproportionate effort. Upon request, the controller shall inform the data subject of those recipients.

The controller shall provide the data subject with a copy of the personal data which are the subject of the processing. For further copies requested by the data subject, the controller may charge a reasonable fee based on the administrative costs. If the data subject has submitted the request

electronically, the information will be provided in electronic format, unless the data subject requests otherwise.

### **Compensation and damages**

Any person who has suffered material or non-material damage as a result of a breach of the Data Protection Regulation is entitled to compensation from the controller or processor for the damage suffered. The processor shall only be liable for damage caused by the processing of data if it has failed to comply with the obligations laid down in law expressly incumbent on the processor or if it has disregarded or acted contrary to the lawful instructions of the controller. If several controllers or processors or both controllers and processors are involved in the same processing of data and are liable for damage caused by the processing of data, each controller or processor shall be jointly and severally liable for the entire damage. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

### **Complaint**

If you have any questions or problems regarding the data processing of the Data Controller, please feel free to contact our company at the contact details provided on page 2 of the information.

### **Possibility of filing a complaint**

You can file a complaint against a possible violation of the data controller with the National Data Protection and Freedom of Information Authority:

<b>National Data Protection and Freedom of Information Authority</b>
<b>1055 Budapest, Falk Miksa street 9-11.</b>
<b>mailing address: 1363 Budapest, Pf.: 9.</b>
<b>E-mail: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a></b>

This information comes into force on 18.03.2026.