

## seddeltaellere.dk

### Privacy Policy

#### INTRODUCTION

The following information is submitted by the BANKNOTE Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (BANKNOTE Trade and Service Limited Company (1163 Budapest, Cziráki utca 26-32, business registration number: 01 09 862912, tax number: 13585349-2-42)) (hereinafter referred to as "Service Provider, Data Manager").

REGULATION No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

(27 April 2016) on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation EC No 95/46 (General Data Protection Regulation), the following information is provided.

This Privacy Policy is governed by the following information: seddeltaellere.dk

The data management information is available at <http://seddeltaellere.dk/adatvedelem>

Amendments to the information document will enter into force by publication at the above address.

#### THE DATA MANAGER AND CONTACT DETAILS:

Name: BANKNOTE Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság

(BANKNOTE Trade and Service Limited Liability Company)

Headquarters: 1163 Budapest, Cziráki utca 26-32., Hungary

Email: [info@cashtech.eu](mailto:info@cashtech.eu)

Phone: +3614010938

#### DEFINITION OF CONCEPTS

1. "Personal data" means any information relating to an identified or identifiable natural person ("data subject"); a natural person may be identified, directly or indirectly, based on one or more factors relating to the physical, physiological, genetic, intellectual, economic, cultural or social identity of an identifier such as name, number, positioning data, online identifier;
2. "Data management" means any automated or non-automated operation or operations on personal data or data files, such as collecting, recording, organizing, arranging, storing, modifying or altering, querying, inspecting, using, communicating, disseminating or making available by other means, alignment or interconnection, restriction, deletion or destruction;
3. "Data manager" means any natural or legal person, public authority, agency or any other body that determines the purposes and means of handling personal data individually or with others; where the purposes and means of data management are defined by the Union or national law, the data manager or the particular aspects of the designation of the data manager may also be defined by the Union or national law;
4. "Data processor" means any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the data manager;
5. "Recipient" means a natural or legal person, a public authority, agency or any other body with whom or with which personal data is communicated, whether or not it is a third party. Public authorities which have access to personal data in an individual investigation in accordance with the Union or national law shall not be considered recipients; the management of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of data management;
6. "Consent of the data subject" means a voluntary, concrete and explicit statement – based on appropriate information – of the will of the data subject by which he or she expresses his/her consent by means of an unambiguous expression (statement or act) to the processing of his/her personal data;

7. "Privacy incident" means any breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or handled in other ways.

## PRINCIPLES FOR MANAGING PERSONAL DATA

Personal information:

- (a) its management shall be conducted lawfully and fairly and in a transparent manner ("legality, fairness and transparency");
- (b) it must be collected for specified, unambiguous and legitimate purposes and must not be treated in a manner incompatible with these purposes; in accordance with Article 89 (1), no further data handling ("end-use") for purposes of public interest archiving, for scientific and historical research purposes or for statistical purposes shall not be considered incompatible with the original purpose;
- (c) it must be appropriate and relevant to the purposes of data management and should be limited to the need ("saving of data");
- (d) it must be accurate and, where necessary, up-to-date; all reasonable measures must be taken to correct or delete inaccurate personal data for the purposes of data management ("accuracy");
- (e) its storage must take place in a form which permits the identification of the data subjects only for the time needed to manage the personal data; the storage of personal data for a longer period of time may only take place if the personal data are processed in accordance with Article 89 (1) for public interest archiving purposes, for scientific and historical research purposes or for statistical purposes, in accordance with the required and appropriate technical and organizational measures for the protection of the freedom and the rights of the data subjects ("limited storage");
- (f) it should be handled in such a way as to ensure adequate security of personal data, including the protection against unauthorized or unlawful handling, accidental loss, destruction or damage to data ("integrity and confidentiality") by means of appropriate technical or organizational measures.

The data manager is responsible for the above, and must be able to demonstrate compliance ("accountability").

## DATA MANAGEMENT

### DATA MANAGEMENT RELATED TO WEBSHOP OPERATION

1. The fact of data collection, the scope of the data being processed and the purpose of data management:

Personal data The purpose of data management

Password It is for secure access to the user account.

(Contact person) Surname and first name It is necessary for contacting, purchasing and issuing a regular invoice.

Email Keeping in contact.

Phone number Keep in contact, negotiate billing or shipping issues more effectively.

Billing name and address Issuing a regular invoice, making the contract and defining its content, modification, monitoring its fulfilment, billing of the charges arising therefrom and the enforcement of the related claims.

Shipping name and address Necessary for delivery

Date of purchase/registration Perform a technical operation

IP address at the time of

purchase/registration

Perform a technical operation

It is not necessary for the email address to include personal data.

2. The circle of data subjects: Everyone registered/purchased on the webshop website.

3. Time period of data handling, deadline for deleting data: Immediately after deleting the registration. Except in the case of accounting documents, as under 169 § (2) of Act C of 2000 on Accounting, this information must be kept for 8 years.

Accounting documents (including main accounts, analytical and/or detailed records), which are directly and indirectly support the accounting, must be kept in a legible form for at least eight years in a retrievable manner consistent with the accounting records.

4. Possible Personal Data Managers, Personal Data Addressee: Personal data can be handled by the sales and marketing staff of the data manager, respecting these principles above.

5. Description of the rights of the data subjects in data management:

- The data subject may apply to the data manager for access to, correction, deletion or limitation of the personal data concerning him/her, and
- may object to the handling of such personal data, and
- the data subject has the right to data migration and to withdraw the consent at any time.

6. It may be possible to initiate to have access to, delete, modify or restrict access to personal data, transferability of data, and objection to data processing in the following ways:

- by post: 1163 Budapest, Cziráki utca 26-32
- by email: [info@cashtech.eu](mailto:info@cashtech.eu),
- by phone: +3614010938.

7. Legal basis for data handling:

7.1. Consent of the data subject, Article 6 (1) (a), Infotv. 5 § (1),

7.2. In accordance with the CVIII Act of 2001 on certain aspects of electronic commerce services and information society services, (hereinafter referred to as Elktv.) 13/A. § (3):

The service provider may handle the personal data that are technically indispensable for the purpose of providing the service. If the other conditions are identical, the service provider must choose and always operate the tools used to provide the service in connection with the information society service in such a way that personal data is processed only if it is strictly necessary for the provision of the service and for the fulfilment of other purposes set out in the Act required, but in this case also to the extent and time required.

7.3. An invoice complying with accounting law is issued in Article 6 (1) (c).

8. We inform you that

- Data management is based on your consent.
- You must provide personal information so that we can complete your order.
- Failure to provide data has the consequence that your order cannot be processed.

## DATA PROCESSORS USED

### Transport

1. Activity performed by a data processor: Delivery of goods, transport

2. Name and contact details of the data processor:

MPL Magyar Posta Logisztika Kft.

1138 Budapest, Dunavirág utca 2-6.

[ugyfelszolgalat@posta.hu](mailto:ugyfelszolgalat@posta.hu)

Phone: (06-1) 333-7777

GTC: <https://www.posta.hu/ugyfelszolgalat/aszf>

Privacy Policy: [https://www.posta.hu/adatkezelesi\\_tajekoztato](https://www.posta.hu/adatkezelesi_tajekoztato)

GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.

2351 Alsónémedi, Európa u. 2.

[info@glshungary.com](mailto:info@glshungary.com)

Phone number: +36 1 802 0265

<https://glsgroup.eu/HU/hu/adatvedelmi-szabalyzat>

United Parcel Service of America

Website: <https://www.ups.com/hu>

Headquarters: 2220 Vecsés, Lőrinci utca 154. Airport City Logistic Park, building G

Email: [upshungary@ups.com](mailto:upshungary@ups.com)

Tel.: +36 1 877 0000

3. The fact of data handling, the scope of managed data: Delivery name, delivery address, telephone number, email address.

4. Data subjects: everyone asking for home delivery.

5. Purpose of data management: Home delivery of ordered product.

6. Time of data handling, deadline for data deletion: Until the end of the home delivery.

7. The legal basis for processing data: the User's consent, Article 6 (1) (a), Infotv. 5 § (1).

Online payment

1. Activity performed by data processor: Online payment

2. Name and contact details of the data processor:

Cib Bank Zrt.

Address: 1027 BUDAPEST, MEDVE U. 4-14.

Postal address: 1537 BUDAPEST, Pf. 394.

Phone number: (36-1) 423-1000

Email address: [cib@cib.hu](mailto:cib@cib.hu)

Web address: [www.cib.hu](http://www.cib.hu)

Privacy Policy: [http://www.cib.hu/jogi\\_szilatkozat/index](http://www.cib.hu/jogi_szilatkozat/index)

PayPal

Parent Company: eBay Incorporated

Headquarters: San Jose, California, USA

Contact: <https://www.paypal.com/hu>

Privacy Policy:

[https://www.paypal.com/en/cgibin/helpscr?cmd=p/gen/ua/policy\\_privacy-outside](https://www.paypal.com/en/cgibin/helpscr?cmd=p/gen/ua/policy_privacy-outside)

3. The fact of data handling, the scope of data processed: Billing name, billing address, email address.

4. Data subjects: Every online purchaser.

5. Purpose of data handling: To conduct online payment transactions, verify transactions and fraud-monitoring in order to protect users (control misuse).

6. Duration of data processing, deadline for data deletion: Until payment is made online.

7. Legal basis for data processing: User's consent, Infotv. 5 § (1), 6 (1) (a), and Act CVIII of 2001 13/A. § (3) on certain aspects of electronic commerce services and information society services.

## COOKIE MANAGEMENT

1. Websites have cookies that are known as "cookies for password-protected workflow," "cookies for shopping carts," and "security cookies", for which the data subjects do not need to be asked for prior consent.

2. The fact of data handling, the range of data processed: Unique identification number, dates, time

3. Data subjects: Everyone visiting the website.

4. Purpose of data management: Identifying users, keeping track of "shopping cart", and tracking visitors.

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

Cookie type Legal basis of data handling Duration of data handling Scope of data Workflow cookies

(session) In accordance with the CVIII of Act 2001 (Elkertv.) 13/A. § (3) on certain aspects of electronic commerce services and information society services.

Until the end of a relevant visitor's session connect.sid In case of other cookies, they will be deleted after 30 days.

6. Possible authorized personal data manager: Using the cookies, the data manager does not handle personal data.

7. Description of the rights of the data subjects in data management: The data subjects have the option to delete the cookies in their browser: Tools/Preferences menu, usually under the Privacy menu item.

8. Legal Basis for Data Processing: No consent is required from the data subject if the exclusive purpose of using the cookies is to provide the user with information via electronic network or if the user subscribed for and expressly requested the service and the provider absolutely needs the cookies to provide that service.

#### USING GOOGLE ADWORDS CONVERSION TRACKING

1. The online advertising program called "Google AdWords" is used by the data manager and uses the Google conversion tracking feature within its framework. Google conversion tracking is Google Inc.'s analytics service (1600 Amphitheater Parkway, Mountain View, CA 94043, USA; "Google").
2. When a User accesses a website through a Google Ad, a conversion tracking cookie is placed on the user's computer. These cookies have limited validity and do not contain any personal information, so the User can not be identified by them.
3. When the User browses on certain pages of the website and the cookie has not expired, Google and the Data Manager will also see that the User clicked on the ad.
4. Each Google AdWords customer receives a different cookie so that they can not be tracked through AdWords clients' websites.
5. The information received through conversion tracking cookies is intended to make conversion statistics for the AdWords conversion tracking customers. Customers will then be informed about the number of users who have been passed on their ad-click and conversion-tagged page. However, they do not have access to information that could identify any user.
6. If you do not want to participate in conversion tracking, you can disable this by blocking cookies from being installed on your browser. Then you will not be included in conversion tracking statistics.
7. For more information and Google Privacy Statement, visit [www.google.de/policies/privacy/](http://www.google.de/policies/privacy/)

#### USING GOOGLE ANALYTICS

1. This site uses the Google Analytics application, a Google Inc. ("Google") web analytics service. Google Analytics uses "cookies", that is text files, that are saved on your computer to help analysing a user-visited web page.
2. Information generated by cookies associated with a website used by the User is usually get to and stored on a US server in Google. By activating IP anonymization on a website, Google previously abbreviates the IP address of the User within the Member States of the European Union or in other States belonging to the Agreement on the European Economic Area.
3. The transfer and shortening of the full IP address to Google's US server will only take place in exceptional cases. On behalf of the operator of this site, Google will use this information to evaluate how the User has used the Website and to report to the website operator about reports related to the activity of the website and to perform additional services related to website and Internet usage.
4. In Google Analytics, it does not associate the IP address that is transmitted by the user's browser with other Google data. The storage of cookies can be prevented by setting the Browser's settings correctly, but please note that in this case, you may not be able to fully use all of the features on this site. You can also prevent Google from collecting and processing cookie information (including your IP address) on the User's website usage by downloading and installing the browser plug-in available on the link below. <https://tools.google.com/dlpage/gaoptout?hl=hu>

#### NEWSLETTER, DM ACTIVITY

1. In accordance with 6 § of the Act XLVIII of 2008 on the fundamental terms and limitations of economic advertising activity, the user may previously and expressly consent to the Service Provider's promotional offers and other items in the contact details provided during registration.

2. In addition, the Customer may, keeping the provisions of this Policy in mind, consent to the Provider's handling of personal data necessary for the transmission of promotional offers.

3. The Service Provider will not send unsolicited advertising messages and, without limitation or reasoning, the user can unsubscribe free of charge from sending offers. In this case, the Service Provider removes all personal data from the Registry and other promotional offers that are required to send the advertisement messages to the User.

The user can unsubscribe from ads by clicking on the link in the message.

4. The purpose of the data collection, the scope of the data processed and the purpose of data management:

Personal Data The purpose of data management

Name, email address Identification, enabling the subscription to the newsletter

Date of subscription Perform a technical operation

Enrolment IP Address Perform a technical operation

5. The circle of data subjects: Everyone who subscribes to the newsletter.

6. The purpose of data management is to send electronic messages with advertisement (email, text message, push messages) to the data subject, provide information about current information, products, actions, new features, etc.

7. Duration of data handling, deadline for deletion of data: until the consent statement is withdrawn, i.e. until the user unsubscribe.

8. Data management registration number: NAIH-73260/2014.

9. Possible Personal Data Managers, Personal Data Addressee: Personal data can be handled by the sales and marketing staff of the data manager, respecting these principles above.

10. Description of the rights of the data subjects in data management:

- The data subject may apply to the data manager for access to, correction, deletion or limitation of the personal data concerning him/her, and
- may object to the handling of such personal data, and
- the data subject has the right to data migration and to withdraw the consent at any time.

11. It may be possible to initiate to have access to, delete, modify or restrict access to personal data, transferability of data, and objection to data processing in the following ways:

- by post: 1163 Budapest, Cziráki utca 26-32
- by email: [info@cashtech.eu](mailto:info@cashtech.eu),
- by phone: +3614010938.

12. The data subject can unsubscribe from the newsletter any time free of charge.

13. Legal basis for data handling: Consent of the data subject, Article 6 (1) (a), Infotv. 5 § (1) and the 6 § (5) of the Act and the Act XLVIII of 2008 on the Fundamental Terms and Limitations of Economic Advertising Activity:

The advertiser, the advertisement provider or the publisher of the advertisement, in the circle specified in the consent, keeps a record of the personal data of the persons expressing their consent to them. The data set out in this record, concerning the recipient of the advertisement, can be handled only in accordance with the consent statement and can be handed over until its revocation, and can only be transferred to a third party with the prior consent of the data subject.

14. We inform you that

- Data management is based on your consent.
- You must provide personal information if you wish to receive our newsletters.
- Failure to provide data has the consequence that you cannot get the newsletters.

## COMPLAINT MANAGEMENT

1. The fact of data collection, the scope of data collected and the purpose of data management.



Personal data Purpose of data management

Surname and first name Identification and keeping in contact

Email address Keeping in contact

Phone number Keeping in contact

Billing name and address Identification, handling the arising quality issues, questions and complaints in connection with the products ordered.

2. Scope of the data subjects: All customers who complain on the webshop website and who complain with quality objection.

3. Period of data handling, deadline for deletion: The minutes, transcripts and copies of the reply to the objection that have been filed in accordance with the CLV Act of 1997/17/A. § (7) on Consumer Protection shall be maintained for 5 years.

4. Possible Personal Data Managers, Personal Data Addressee: Personal data can be handled by the sales and marketing staff of the data manager, respecting these principles above.

5. Description the rights of the data subjects in data management:

- The data subject may apply to the data manager for access to, correction, deletion or limitation of the personal data concerning him/her, and
- may object to the handling of such personal data and
- the data subject has the right to data migration and to withdraw the consent at any time.

6. It may be possible to initiate, delete, modify or restrict access to personal data, transferability of data, and objection to data processing in the following ways:

- by post: 1163 Budapest, Cziráki utca 26-32.

- by email: at info@cashtech.eu,

- by phone: +3614010938.

7. Legal basis for data handling: the consent of the data subject, Article 6 (1) (c), Infotv.

5. § (1) and CLV Act of 1997 Act 17 / A. § (7) on Consumer Protection.

8. We inform you that

- providing personal data is based on a contractual obligation.
- the processing of personal data is a precondition for the conclusion of the contract.
- you must provide personal information so that we can handle your complaint.
- failure to provide data has the consequence that we can not handle the complaint we received.

## SOCIAL NETWORK SITES

1. The fact of the data collection, the scope of data being processed: Facebook/Google+/Twitter/Pinterest/Youtube/Instagram, etc. registered on social network pages or the user's name and profile picture.

2. The circle of data subjects: All those who are registered on Facebook/Google+/Twitter/ Pinterest/ Youtube/Instagram etc. social networking sites, and "liked" the website.

3. Purpose of the data collection: To share, or "like" or promote certain content elements, products of the website or the website itself on social networking sites.

4. Duration of data processing, deadline for deletion of data, possible data managers, and their rights of the data subjects in data management: Information about the source, their handling, the method of transfer and the legal basis of that can be consulted on the given social networking site. Data management takes place on social networking sites, so the duration of the data handling, the ways of deleting and modifying the data are governed by the rules of the respective social network site.

5. Legal basis for data handling: the data subject's volunteering consent to the processing of his or her personal data on social networking sites.

## CUSTOMER RELATIONS AND OTHER DATA MANAGEMENT

1. If a question is arising about the use of our services or the data subject may have a

problem, he or she may contact the data manager using the methods provided on the website (phone, email, social networking sites, etc.).

2. The Data Manager will delete the received emails, messages, phone calls, facebook, etc. with the information provided with the name and email address of the data subject as well as other voluntarily entered personal data, not later than two years from the date of disclosure.

3. Data management not listed in this information is provided when data is disclosed.

4. The Service Provider is obliged to provide information, communicate, transfer or make available documents on the basis of an exceptional authority request or authorization by law, in case of request of other bodies.

5. In these cases, the Service Provider shall provide the Requesting Party with personal data only to the extent necessary to achieve the purpose of the request if it has indicated the exact purpose and scope of the data.

## THE RIGHTS OF THE DATA SUBJECTS

### 1. Right of access

You are entitled to receive feedback from the data manager about whether your personal data is being processed and, if such processing is in progress, you have the right to have access to your personal information and the information listed in the regulation.

### 2. Right to correction

You are entitled to request the data manager to correct any inaccurate personal information that he or she is required to do without undue delay. Taking into account the purpose of data management, you are entitled to request the supplementation of incomplete personal data, including means of a supplementary statement.

### 3. Right to Cancellation

You are entitled to request that the data manager, without undue delay, to delete personal information about you, and that the data manager is obliged to delete personal information about you, without undue delay, under certain conditions.

### 4. The Right to Effacement

If the data manager has disclosed the personal data and is required to cancel it, he/she must take reasonable steps, taking into account the technology available and the costs of implementation, in order to inform the data managers handling the data that you have applied for the deletion of links connected to the personal data or the deletion of a duplicate or other copies of these personal data.

### 5. Right to Restrict Data Management

You are entitled to request that your data manager restricts your data handling if one of the following conditions is met:

- You dispute the accuracy of your personal data; in this case, the restriction applies to the period of time that the data manager can check the accuracy of personal data;
- Data handling is illegal and you are opposed to the deletion of data and you ask to restrict them instead;
- The data manager no longer needs personal data for data processing, but you require them to submit, enforce, or protect legal claims;
- You have objected to data manipulation; in this case, the restriction applies to the period in which it is established that the legitimate reasons for the data manager have priority over your legitimate reasons.

### 6. Right to data migration

You are entitled to receive your personal data that is made available to you by a data manager in a clear, widely used machine-readable format and you are entitled to transfer this data to another data manager without this being obstructed by the data manager who you provided personal information to (...)

### 7. Right to Protest

You are entitled to object to the handling of your personal information (...), including profiling based on these provisions, for any reason relating to your own situation.

### 8. Protest against direct business acquisition



If your personal data is handled for direct business, you are entitled to protest at any time against the processing of any personal data relating to it, including profiling, if it is related to direct business acquisition. If you object to personal data being handled for direct business purposes, your personal information can no longer be handled for that purpose.

9. Automated decision-making in individual cases, including profiling

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You are entitled to exclude the scope of any decision-making based solely on automated data handling, including profiling, which would have a legal effect on you or affect you significantly.

The preceding paragraph shall not apply if the decision is based on the following:

- You are required to conclude or complete a contract between you and the data manager;
- the decision is made possible by the law of the Union or of the Member States which applies to the data manager and states appropriate measures to protect your rights and freedoms and legitimate interests; or
- it is based on your explicit consent.

## DEADLINE FOR TAKING MEASURES

The data manager informs you of any measures taken in response to these requests without undue delay but in any way within one month of receipt of the request.

If necessary, it may be extended by 2 months. The manager will inform you about the extension of the deadline by indicating the cause of the delay within 1 month of receipt of the request.

If the data manager fails to take action upon your request, he or she will notify you without delay and at the latest within one month of the receipt of the request for reasons of non-action and about the fact that you may file a complaint with a supervisory authority and exercise the right of appeal.

## SECURITY OF DATA MANAGEMENT

The data manager and the data processor shall take appropriate technical and organizational measures taking into account the state of science and technology and the costs of implementation, the nature, scope, circumstances and objectives of data management and the risk of varying probability and severity of natural persons' rights and freedoms to guarantee an adequate level of data security, including, inter alia, where appropriate:

- a) the pseudonymization and encryption of personal data;
- (b) ensuring, maintaining, integrity, availability and resilience of the continuing confidentiality of systems and services used to manage personal data;
- (c) in the case of a physical or technical incident, the ability to restore access to personal data and the availability of data in good time;

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- (d) the procedure for systematic testing, assessment and evaluation of the effectiveness of technical and organizational measures taken to ensure the security of data processing.

## INFORMING THE DATA SUBJECT ABOUT THE PRIVACY INCIDENT

If the privacy incident is likely to pose a high risk to the rights and freedoms of natural persons, the data manager shall inform the data subject about the privacy incident without undue delay.

Information given to the data subject should be clearly and easily understood and the nature of the privacy incident must be disclosed and the name and contact details of the Data Protection Officer or other contact person providing additional information should be disclosed as well; the likely consequences of a privacy incident should be described; measures taken or planned by the data manager to remedy a privacy incident should be described, including, where appropriate, measures to mitigate any adverse consequences of a privacy incident.

The data subject shall not be informed if any of the following conditions are met:

- the data manager has implemented appropriate technical and organizational protection measures and applied these measures to the data covered by the privacy incident, in particular the measures, such as the use of encryption, which make the data impossible to understand for persons who are unauthorized to access personal data;
- after the privacy incident, the data manager has taken further measures to ensure that high risk for the rights and freedoms of the data subject is no longer likely to be realized;
- Informing would require disproportionate efforts. In such cases, the data subject shall be informed by means of publicly disclosed information or a similar measure shall be taken to ensure that such information is equally effective.

If the data manager has not yet notified the data subject of the privacy incident, the supervisory authority may, after considering whether the privacy incident is likely to pose a high risk, inform the data subject.

#### NOTIFICATION OF PRIVACY INCIDENT TO THE AUTHORITY

The privacy incident shall be reported to the supervisory authority under Article 55 without undue delay and, if possible, no later than 72 hours after the privacy incident becomes known, unless the privacy incident is unlikely to pose a risk to the rights and freedom of natural persons. If the notification is not filed within 72 hours, the reasons for proving the delay must also be enclosed.

#### OPPORTUNITY FOR COMPLAINT

You can make a complaint against a possible infringement of the data manager with the National Data Protection and Information Authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Postbox: 5.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

#### CONCLUSION

During the preparation of this document we have been following the following legislation:

- Regulation (EC) No 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 (EC) No 95/46 (General Data Protection Regulation)
- Act 2011 CXII. on information self-determination and freedom of information (hereinafter: Infotv.)
- Act CVIII of 2001 on Electronic Commerce Services and Information Society Services (in particular 13/A. §)
- Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers;
- Act XLVIII of 2008 on the Fundamental Conditions and Limitations of Commercial Advertising Activity (in particular 6 §)
- Act 2005 XC on Freedom of Electronic Information
- Act C of 2003 on Electronic Communications (in particular 155. §)
- 16/2011 on EASA/IAB Recommendation on Best Practice in Opinion and Behavioural Online Advertising
- Recommendation of the National Data Protection and Information Authority on the data protection requirements for prior information
- 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 (EC) No 95/46