

PRIVACY POLICY

I. INTRODUCTION

Based on Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and on Act CXII of 2011 on Informational Self-Determination and Freedom of Information, the processor of the personal data must provide – in a concise, transparent, clear and easily accessible way – information about the data processing to the person concerned, and must support the data subject in exercising their rights.

By viewing the homepage and using its services and functions (e.g. messaging, registration), visitors of Zajkőz Kft.'s homepage (that can be found here: <https://zajkoz.hu>) accept and grant their expressed approval to Zajkőz Kft. to record and manage the personal data provided by the visitor for the purpose and period defined by the legal relationship (e.g. contact, quotation request etc.) formed between the data subject and the Service Provider.

During their data processing activity, Zajkőz Kft. pays special attention to the protection of personal data, to the following the obligatory regulations and to safe and fair data processing.

II. TERMS USED IN THE POLICY

data processor: a natural or legal person, public authority, agency or any other body, who handles personal data on behalf of Zajkőz Kft.;

data processing: any kind of automatic or non-automatic operation or summary of operations performed on personal data or data files, such as collection, recording, classification, segmentation, storage, transformation or modification, query, viewing, usage, disclosure, transmission, distribution or making available by any other means, synchronization, connection, restriction, deletion or destruction;

data controller: natural or legal person, public authority, agency or any other body who defines the purposes and tools of personal data processing independently or with others; if the purposes and tools of data processing are defined by the legal regulations of the European Union or its member countries, the data controller or the factors that must be taken into account when appointing the data controller can be also determined by the legal regulations of the European Union or its member countries;

data privacy incident: such security breaches that result in the accidental or unlawful destruction, loss, modification, unauthorized disclosure or unauthorized access to transmitted, stored or in any other way handled personal data;

consent of the data subject: voluntary, specific and clear declaration of the data subject's will that is based on appropriate information, with which the data subject through a declaration or through an act that clearly expresses confirmation indicates that the he/she grants his/her consent to managing personal data concerning him/her;

recipient: a natural or legal person, public authority, agency or any other body, to whom the personal data are disclosed to, regardless of it being a third person or not; public authorities that can access personal data according to EU or member state laws in scope of an individual investigation are not considered third parties; **third**

party: a natural or legal person, public authority, agency or any other body that is not the same as the data subject, the data controller, the data processor or those persons who received authorization to handle the personal data under the direct control of the data controller or data processor;

personal data: any information about an identified or identifiable natural person ("data subject"); identifiable is the natural person who can be directly or indirectly identified, especially based on an identifier such as name, number, geographic information, online identification or one or more factors in connection with the natural person's physical, physiological, genetical, mental, economic, cultural or social identity; **authority:** National Authority for Data Protection and Freedom of Information

III. DATA CONTROLLERS AND DATA PROCESSORS

1. Website maintained by

Company name: Zajkőz Kft.

Registered Office: H-1106 Budapest, Fehér út 10/a-b.

Postal address: H-1581 Budapest, Pf. 66.

Company registration number: 01-09-277672

Tax number: 25481716-2-42

Representative: Szilvássy Roland

Phone No: +36 30 825 9336

Email: office@zajkoz.hu

Web: <https://zajkoz.hu>

2. Hosting service provider of the website

The previous consent of the data subject is not required to use the hosting service provider as data processor, but the data subject must be informed. Accordingly, we provide the following information:

Zajkőz Kft. uses a data processor to maintain and manage its website, who provides IT services (hosting service), and in this context – for the period our contract with the provider is valid – manages the personal data provided on the website. The data processing operation handled by the data controller is the storage of personal data on the server.

Company name: INTEGRITY Informatikai Kft.

Registered Office: Székesfehérvár

Postal address: H-1132 Budapest, Victor Hugo u. 18-22.

Company registration number: 07-09-003739

Tax number: 11115139-2-07

Email: info@integrity.hu

Web: <https://integrity.hu>

IV. ENSURING THE LAWFULNESS OF DATA PROCESSING

1. Data processing based on the consent of the data subject

1.1 It is considered as consent granted for managing personal data when the data subject during viewing Zajkőz Kft.'s homepage (www.zajkoz.hu) declares this approvingly by checking a check box or during using services connected to information society performs technical settings for this purpose. All other declarations or acts are also considered as consent which clearly indicate the data subject's consent to the planned usage of his/her personal data. Remaining silent, a pre-checked check box and non-action are not considered as consent.

1.2 Revoking consent must just as easily feasible as granting it.

1.3 If the recording of personal data was performed with the consent of the data subject, for the purposes of fulfilling its legal duties applicable, unless the law provides otherwise Zajkőz Kft. can manage the recorded data without any further special consent and also after the data subject has revoked his/her consent.

2. Facilitating the data subject's rights

Zajkőz Kft. must enable the data subject to practice his/her rights during all data processing.

V. VISITOR DATA PROCESSING ON THE HOMEPAGE OF ZAJKÖZ KFT., PROVIDING INFORMATION ABOUT THE USE OF COOKIES

The visitor of the homepage must be informed about the use of cookies, and – except for the operational cookies technically essential – their consent must be requested for the usage.

1. General information about cookies

A cookie is such data that is sent by the website to the browser of the visitor, for the purpose of storing and later – when the same website is visited again – loading its contents again. A cookie can be valid until the browser is closed or until an unlimited period of time.

The basic purpose of the cookies is to enhance user experience and to make the use of the websites smoother. At the same time cookies allow for keeping track of the user by the operator of the visited website or other such providers, whose content is integrated into the site (e.g. Facebook, Google Analytics.). Therefore cookies can be suitable for creating a user profile, and in which case the content of the cookies can be considered personal data.

The usage of cookies is not obligatory to be accepted, and besides this, the settings of the browser can be reset any time to refuse all cookies or to indicate when the system is sending a cookie. Although the default settings of most browsers automatically accept cookies, there is usually a way to turn off automatic acceptance and to set the browser to offer the possibility to choose each and every time. Information about the cookie settings of the most popular browsers can be found here:

Google Chrome:	https://support.google.com/accounts/answer/61416?hl=hu
Firefox:	https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn
Microsoft Internet Explorer 11:	http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11
Microsoft Internet Explorer 10:	http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7
Microsoft Internet Explorer 9:	http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9
Microsoft Internet Explorer 8:	http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8
Microsoft Edge:	http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq
Safari:	https://support.apple.com/hu-hu/HT201265

However, attention must be called to the fact that some functions or services of the website will not work properly without the cookies.

2. Cookie types

2.1 Operational cookies: these are essential cookies, without which the site cannot function and the use of the website's services is impossible. These cookies get activated temporarily from the moment the browser is opened until it is closed. When the browser closes, the operational cookies are deleted. These cookies do not store such data about the user which could be used for marketing purposes, for example what sites the user visited.

2.2 Cookies facilitating usage: those cookies that record the choices of the user, for example in which format the user would like to view the site. These basically mean the data of the settings stored in the cookies.

2.3 Performance cookies: these cookies collect information about the behaviour of the user on the website, about the time spent there and the clicks. These are usually third party applications (e.g. Google Analytics, AdWords or Yandex.ru cookies) and are suitable for user profiling.

More information about Google Analytics cookies:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

More information about Google AdWords cookies:

<https://support.google.com/adwords/answer/2407785?hl=hu>

3. The cookies used on the website of Zajkőz Kft. and the data created during the visit made to the site

Our website uses only operational cookies, which – according to Item 2 – are essential for the operation of the homepage, and do not store such data about the user which could be used for marketing purposes (e.g. what sites the user visited).

VI. INFORMATION ABOUT THE PERSONAL RIGHTS OF THE DATA SUBJECT

1. Summary of the data subject's rights:

1. Transparent information, communication and enabling the data subject to practice his/her rights
2. Right to be previously informed – when personal data is collected from the data subject
3. Informing the data subject and the information to be made available to him/her, if Zajkőz Kft. did not obtain the personal data from the data subject
4. Right of accessibility of the data subject
5. Right of modification
6. Right of erasure ("the right to be forgotten")
7. Right of restriction of data processing
8. Notification obligation with regards to modification or erasure of personal data, and restriction of data processing
9. Right of objection
10. Notifying the data subject about data privacy incidents

11. The data subject has the right to revoke the consent granted to manage his/her personal data at any time
12. The data subject's right of appeal is a complaint addressed to supervisory authority in front of the court.

2. The data subject's rights in detail:

1. *Transparent information, communication and enabling the data subject to practice his/her rights*

- 1.1. Zajkőz Kft. must provide all information and notification to the data subject with regards to the processing of personal data in a concise, transparent, under stable and easily accessible way, in a clear and plain manner, especially in case of any information addressed to children. The information must be provided in writing and in other ways – including electronically, if appropriate. Upon the data subject's request verbal information can also be given, provided that the data subject's personal identity was validated by some other means.
- 1.2. Zajkőz Kft. must support the data subject in practicing his/her rights.
- 1.3. Zajkőz Kft., without undue delay, but definitely within one month from receiving the request informs the data subject about the measurements taken as a results if the data subject's request to practice his/her rights. This deadline can be extended by two months according to the conditions specified in the Regulation, about which the data subject must be notified.
- 1.4. If Zajkőz Kft. does not take measurements as a result of the data subject's request, without delay, but latest within one month from receiving the request notifies the data subject of the reasons for not taking the measurement, and informs the data subject that he/she can submit a complaint to a supervisory authority and can exercise their right of appeal to the court.
- 1.5. Zajkőz Kft. provides the notification and the information about the data subject's rights and the measurement for free, but a fee can be charged in the cases specified by the Regulation.

2. *Right to be previously informed – when personal data is collected from the data subject*

- 2.1. The data subject has the right to receive information about the fact and information (who uses what, for what purpose, how, from when, until when) in connection with data processing before data processing is started.
- 2.2. If Zajkőz Kft. want to perform further personal data processing besides the purpose of their collection, the data subject must be notified of this other purpose and any relevant additional information prior to the further processing.

3. *Informing the data subject and the information to be made available to him/her, if Zajkőz Kft. did not obtain the personal data from the data subject*

- 3.1. If Zajkőz Kft. did not acquire the personal data from the data subject, Zajkőz Kft. must notify the data subject
 - a) within maximum one month from the date the personal data was acquired;

- b) if the personal data is used to keep contact with the data subject, at least when establishing first contact with the data subject; or
 - c) if probably the data will be disclosed also to other recipients then at the first time the personal data is disclosed
- of the facts and information with regards to data processing, and about the categories of the data subject's personal data, and also about the source of the personal data and if appropriate, of whether the data were acquired from publicly accessible sources or not.

4. *Right of accessibility of the data subject*

- 4.1. The data subject can ask information from Zajkőz Kft. about whether there is data processing concerning the data subject, and if yes, what personal data are processed.
- 4.2. If personal data are forwarded to a third country or international organization, the data subject has the right to receive information about the appropriate guarantees with regards to the transmission.
- 4.3. Zajkőz Kft. must make the copy of the personal data available that is the subject of the data processing to the data subject. For other copies requested by the data subject, Zajkőz Kft. can charge a fee of reasonable proportion based on the administrative cost.

5. *Right of modification*

- 5.1. The data subject can indicate if the data managed by Zajkőz Kft. are incorrect, and can request to use the correct personal data instead of them.
- 5.2. Considering the purpose of the data processing, the data subject also has the right to request missing personal data to be completed – besides other things, through a supplementary declaration.

6. *Right of erasure (“the right to be forgotten”)*

- 6.1. The data subject can ask his/her data to be deleted any time. If Zajkőz Kft. allowed access to third persons to the data requested to be deleted, then all those must be notified, to whom the certain data was disclosed to, to delete all references and all personal data stored by them. The purpose of this is to ensure – unless there is a legal or logical obstacle preventing this – that the concerned data “disappears” from the databases that can be found.
- 6.2. The right of erasure cannot be validated for example if data processing is required
 - a) for exercising the right of freedom of expression and information, or
 - b) for the establishment, exercise or defence of legal claims.

7. *Right of restriction of data processing*

- 7.1. In certain cases the person affected by the processing of personal data can request processing of their personal data to be restricted – for example in an unclear, legally disputed situation, or when data processing is no longer necessary, but the data subject would like to continue it.

8. *Notification obligation with regards to modification or erasure of personal data, and restriction of data processing*

- 8.1. Zajkőz Kft. informs all recipients about all corrections, deletions or data processing restrictions, to whom the personal data was disclosed to, except when this proves to be impossible or would require a disproportionately large effort. On the request of the data subject, Zajkőz Kft. provides information about these recipients.

9. *Right of objection*

- 9.1. The data subject has the right to object at any time due to reasons connected to his/her own situation to the processing of his/her personal data for a specific reason (based on public interest, performance of public service or legitimate interest). This typically occurs when the data subject did not grant his consent to the specific processing of his/her personal data.

10. *Notifying the data subject about data privacy incidents*

- 10.1. If the data privacy incident probably involves a high risk from the aspect of the rights and freedom of natural persons, Zajkőz Kft. must notify the data subject of the data privacy incident without undue delay.
- In this notification, the nature of the data privacy incident must be described in a clear and plain manner, and it must include at least the following:
- a) the name and contact data of the data privacy officer or other contact person providing further information;
 - b) description of the probable consequences arising from the data privacy incident;
 - c) the measurement taken by Zajkőz Kft. to solve the data privacy incident, including – if applicable – the measurements taken to mitigate the probable harmful consequences occurring from the data privacy incident.
- 10.2. The data subject does not have to be informed when any of the following conditions are fulfilled:
- a) Zajkőz Kft. has taken proper technical and organizational safety measurements, and these measurements have been applied in connection with the data involved in the data privacy incident;
 - b) Zajkőz Kft. has taken such further measures after the data privacy incident which ensure that the high risk related to the rights and freedom of the data subject will probably not be realized after that;
 - c) notification would require a disproportionate amount of effort. In such cases data subjects must be notified through publicly disclosed information, or

such similar measures must be taken which ensure the similarly effective notification of the data subjects.

11. The data subject has the right to revoke the consent granted to manage his/her personal data at any time

- 11.1. The data subject has the right to revoke his/her consent at any time. Revoking consent does not affect legality of the data processing performed based on the consent, before consent was revoked. The data subject has the right to revoke consent just as easily as granting it.

12. The data subject's right of appeal is a complaint addressed to supervisory authority in front of the court.

- 12.1. In case of unlawful data processing experienced by the data subject, a civil lawsuit can be initiated against Zajkőz Kft. Making a decision about the dispute is in the jurisdiction of the court. The lawsuit – according to the preference of the data subject – can also be submitted at the court in the area of his/her residence (the list and contact data of the courts can be found here: <http://birosag.hu/torvenyszekek>)
- 12.2. Without prejudice to any administrative or judicial remedy, every data subject has the right to submit a complaint at the supervisory authority – specifically in the member country of usual residence, work or where the assumed infringement occurred –, if the data subject considers that data processing of his/her personal data violates the Regulation.
- 12.3. Name and contact data of the supervisory authority:
National Authority for Data Protection and Freedom of Information (NAIH)
address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c
postal address: H-1530
Budapest, Pf.: 5
e-mail: ugyfelszolgalat@naih.hu
phone: +36 (1) 391-1400
fax.: +36 (1) 391-1410
website: www.naih.hu

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