

## OUR PRIVACY STATEMENT

informs you, visitor to our website, recipient of our services, or possibly our future translation colleague, about the data processing and data protection rules observed in our company.

### 1. What are the principles we follow in our data processing methodology?

Our company observes the following principles in its data processing practices:

- a) your personal data will be processed lawfully, fairly and in a transparent manner with consideration for you.
- b) the personal data we collect fulfil specified, explicit and legitimate purposes only, and are not treated in ways that are incompatible with these purposes.
- c) the personal data we collect and process are appropriate and relevant to the purposes of the data processing methodology and are limited to what is necessary to fulfil those purposes.
- d) our company will take all reasonable steps to ensure that the personal data we process are accurate and up-to-date, and we erase or rectify any inaccurate data without any delay.
- e) we store your personal data only for the time necessary to process your identification and to achieve the purposes for which they are processed.
- f) we apply appropriate technical and organizational measures to ensure the appropriate security of personal data against unauthorized or unlawful handling, loss, destruction or damage to personal data.

### How do we process your personal data?

- a) our company collects, records, organizes, stores and uses your data only to the extent necessary, based on your prior informed and voluntary consent, and each time for the intended purposes only.
- b) in some cases, the processing of your data is based on legal regulations and is compulsory, a fact to which your attention will specifically be drawn,

c) and, in certain cases, our company or a third party has a legitimate interest in processing your personal data, such as during the operation, development and security implementation of our website.

## 2. Who are we?

|                                    |   |
|------------------------------------|---|
| Our company name                   | Nagy Barna e.v.   |
| Our registered address:            | 4032 Debrecen, Tessedik Sámuel u. 113.                              |
| Our tax number:                    | 68231291-1-29   |
| Our NAIH number:                   | 51438197  |
| Our company's website:             | <a href="https://www.joybyhoney.hu/">https://www.joybyhoney.hu/</a> |
| Where to access our privacy policy | <a href="https://www.joybyhoney.hu/">https://www.joybyhoney.hu/</a> |

Our company is not obliged to appoint a data protection officer under Article 37 of the GDPR.

In order to provide high-quality customer service, our company calls upon the services of the following data processors:

Name, address, company registration number and contact details of data processors:

|                     |  |
|---------------------|--|
| Company name        | Magyar Hosting Kft.                                    |
| Registered address: | H-1132 Budapest, Victor Hugo u. 18-22                  |
| Phone number:       | +36 1 700 2323   |
| E-mail:             | <a href="mailto:info@mhosting.hu">info@mhosting.hu</a> |

## 3. What are the cookies and how do we handle them?

Cookies are small data files transmitted to your computer through the website you are visiting, and are saved and stored by your internet browser. Most of the commonly used Internet browsers (Chrome, Firefox, etc.) accept and allow the download and use of cookies by default, but it is up to you to refuse or disable them by changing your browser settings or to delete

cookies that are already stored on your computer. For more information on the use of cookies, follow the "help" menu item in your browser.

Our company will inform you of the cookies that require consent – if the data processing already starts when you access the website – at the beginning of the first visit and we will ask for your consent.

Our company does not use or allow cookies that allow third parties to collect data without your consent.

Accepting cookies is not compulsory; however, our company cannot be held responsible if, in the absence of cookies, our website fails to function as intended.

#### 4. What else do you need to know about our website's data processing practices?

You voluntarily provide us with personal data during the registration process required for the newsletter to be sent and when contacting our company, which is why we ask you to pay attention to the authenticity, correctness and accuracy of your data, as you are responsible for them. Incorrect, inaccurate or incomplete data may prevent you from using our services. If you provide personal information on someone other than yourself, we will assume that you have the necessary authority to do so.

You may withdraw your consent to data processing at any time, free of charge,

☒ by withdrawing your consent to data processing or

☒ by withdrawing or blocking the consent to the processing or use of any data necessarily completed during registration.

For technical reasons, we undertake to register the withdrawal of consent within a period of 14 days; however, we would like to draw your attention to the fact that in order to fulfill our legal obligation, we may process certain data even after the withdrawal of consent.

In the event of the use of misleading personal data, or if one of our visitors commits a criminal offence or attacks our company's system, we will delete their data without delay or, if necessary, retain it for the duration of establishment of any civil liability or criminal proceedings.

## 5. What do you need to know about our data processing activities for newsletter purposes?

You can consent to the use of your personal data for marketing purposes by modifying your personal data stored on the newsletter registration interface (i.e. by clearly stating your deliberate consent). In this case, we will also process your data – until the withdrawal of consent – in order to send a newsletter, and we will send you advertising materials and other items, as well as information and offers and/or a newsletter. (Grtv. § 6).

You can give your consent to the newsletter jointly or separately or withdraw it free of charge at any time.

Withdrawal of consent to data processing for newsletter purposes is considered withdrawal of consent in all cases.

We undertake to register the revocation or cancellation of consent within 14 days for technical reasons.

## 6. Other data processing issues

We may only transfer your data within the limits set by law, and in the case of our data processors, we stipulate by contractual terms that they may not use your personal data for purposes contrary to your consent. See section 2 for more information.

Our company does not transfer data abroad.

The Court, the Public Prosecutor's Office and other authorities (e.g. police, tax office, National Authority for Data Protection and Freedom of Information) may contact our company for information, disclosure or provision of documents. In these cases, we must comply with our data reporting obligation, but only to the extent strictly necessary to achieve the purpose of the request.

Contributors and employees involved in the data handling and/or the data processing activities of our company are entitled to become acquainted with your personal data to a predetermined extent, subject to the obligation of confidentiality.

We will protect your personal information through appropriate technical measures and others, as well as ensure the security and availability of the information, and protect it from unauthorised access, alteration, damage or disclosure, and any other unauthorised use.

As part of our organizational measures, we control physical access within our building, continuously train our employees and keep paper-based documents locked with adequate protection. As part of our technical measures, we use encryption, password protection and anti-virus

software. However, please note that data transmission over the Internet cannot be considered as completely secure data transmission. Our company makes every effort to make our processes as secure as possible; however, we cannot take full responsibility for the transmission of data through our website, although we adhere to strict requirements regarding the data we receive to protect your data and prevent unauthorised access.

## 7. What are your rights and what legal remedies are available?

About processing your data:

- you may request any information regarding it,
- you may request the correction, modification or supplementation of your personal data processed by us,
- you may object to the data processing and request the deletion or blocking of your data (except for compulsory data processing),
- you may appeal to a court,
- you may file a complaint with the supervisory authority or initiate proceedings (<https://naih.hu/panaszuegyintezes-rendje.html>)

### **Supervisory Authority: National Authority for Data Protection and Freedom of Information**

Registered office: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1374 Budapest, Pf. 603.

Phone: +36 (1) 391-1400

+36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <https://naih.hu/>

**At your request, we will provide you with all information related to your data and how they are processed by us or by our authorized data processor. They will include:**

- your personal data,
- their source,
- the purpose and legal basis of the data processing,
- the duration and, if this is not possible, the criteria for determining this period,
- the names and addresses of our data processors and their data processing activities,
- the circumstances and effects of data protection incidents and the measures we have

taken to prevent and deter them, as well as

- the legal basis and recipient of the transfer of your personal data.

We will provide your information as soon as possible after the application is submitted, but within a maximum of 1 month. The information is free of charge unless you have already submitted an information request to us for the same set of data in the current year. Reimbursement of costs already paid by you will be refunded in the event that the data have been processed unlawfully or a request for information has led to a correction. We may refuse to provide information only in cases provided for by law, indicating the precise act in question, or by providing information on the possibility of an appeal or recourse to the Authority.

Our company will notify you of the rectification, blocking, marking or deletion of personal data, as well as all those to whom the data have previously been transmitted for data processing purposes, unless failure to notify does not harm your legitimate interests.

If we do not comply with your request for rectification, blocking or cancellation, we will provide the reasons for our refusal in writing or, with your consent, electronically after receiving the request (not later than within 1 month) and inform you of the possibility of an appeal or recourse to the Authority.

If you object to the processing of your personal data, we will examine the objection as soon as possible after the submission of the request (but not later than within 1 month) and will inform you in writing of our decision. If we have determined that your objection is wellfounded, we will terminate the processing of your data - including additional data collection and transmission - and will close the data, and we will notify all parties to whom we have previously transmitted the personal data affected by the objection and who are under the obligation to take the necessary actions validating your right to object.

We will refuse the request if we prove that the processing is justified by overriding legitimate reasons which take precedence over your interests, rights and freedoms or that relate to the submission, enforcement or defence of legal claims. If you do not agree with our decision, or if we miss the deadline, you are entitled to turn to the courts within 30 days of the decision being announced or the last day of the deadline.

Data protection lawsuits fall within the jurisdiction of the tribunal, which may – as per the subject's choice – also be instituted before the tribunal of the place of residence or stay of the subject. A foreign national may also lodge a complaint with the competent supervisory authority of his place of residence.

**Please contact our company before submitting your complaint to the supervisory authority or court in order to consult and resolve the problem as soon as possible.**

## 8. What are the main legal provisions governing our activities?

- 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 (GDPR)
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information - (Info. Act)
- Act V of 2013 on the Civil Code (Ptk.)
- Act CVIII of 2001 on E-commerce and Certain Issues Regarding Information Society Services - (Eker tv.)
- Act C of 2003 on Electronic Communications - (Ehtv.)
- CLV of 1997 on Consumer Protection - (Fogyv tv.)
- CLXV of 2013 on Complaints and Notices of Public Interest Pktv.)
- Act XLVIII of 2008 on Essential Conditions of, and Certain Limitations to Business Advertising Activity - (Grtv.)

## 9. Modification of data management information

Our company reserves the right to amend the present Privacy Statement, of which it shall inform the parties concerned accordingly. The disclosure of data processing information occurs on the website <https://www.joybyhoney.hu/>