

Information about data management on the website of Téta Kft.

Management of Internet cookies

Any external visitor may access the Company's website and the information provided by the Company. During a visit to the website, the website hosting provider records the visitor's data in order to monitor the functioning of the service, prevent abuse and ensure its proper operation. The purpose of the recording is to collect information on the use of the website, to compile statistics and analyses on the number of visits and internet usage. External service providers may place a so-called cookie on the user's computer, enabling them to link the user's current visit to previous visits. The user can refuse the cookie request at any time by opening a window on the website.

"A cookie is a small file that is placed on your computer when you visit a website. When you visit that website again, the cookie enables the website to recognise your browser. Cookies can also store user preferences and other information. On other platforms, where cookies are not available or cannot be used, other technologies are used that have a similar purpose to cookies, such as ad identifiers on Android mobile devices. You can reset your browser settings to reject all cookies or to indicate when a cookie is being sent. However, some website features or services may not work properly without cookies."¹ "This website may use cookies from Google Analytics, which are governed by Google's privacy policy."²

Strictly necessary cookies

Such cookies are essential for the proper functioning of our website. Without accepting these cookies, we cannot guarantee that our website will function as expected, nor that you will be able to access all the information you are looking for.

These cookies do not collect personal information about you or information that can be used for marketing purposes.

Examples of strictly necessary cookies include Performance cookies, which collect information about whether our website is working properly, whether there are any errors in its operation, help us improve our website by flagging any errors, and tell us which parts of the website are the most popular.

Functional cookies

These cookies ensure that our website is consistently tailored to your needs and remember your preferences.

Scope and legal basis of the data processed

Data processed:

- date,
- time,
- IP address of the user's computer,
- IP address of the page visited,
- IP address of the previously visited page,
- information about the user's operating system

EU Regulation 2016/679 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/EC, pursuant to Article 5 of Act CXII of 2011 on Freedom of Information and Informational Self-Determination, the voluntary consent of individuals.

Duration of processing: 2 years from the date of accessing the website.

Data processing for marketing purposes

Data processing in relation to the messaging facility on the website.

Data processed:

- name,
- email address

Duration of processing: until the Data Subject's consent is withdrawn.

Legal basis for data processing

Your voluntary consent, which you provide to the Data Controller by sending the message [processing under Article 6(1)(a) of the GDPR Regulation].

Other data processing

If the Data Controller intends to carry out further processing, it shall provide prior information on the essential circumstances of the processing (legal background and legal basis of the processing, purpose of the processing, scope of the data processed, duration of the processing).

You are informed that written requests for data from public authorities based on a legal mandate must be complied with by the Data Controller. The Data Controller shall keep records of data transfers in accordance with Article 15 (2) - (3) of Act CXII of 2011 on Information Technology (Infotv.) (to which authority, what personal data, on what legal basis, when the Data Controller transferred the data), the content of which the Data Controller shall provide information on request, unless the provision of information is excluded by law.

Customers' rights

During the period of processing, you have the following rights under the Regulation:

- the right to withdraw consent,
- the right of access to personal data and information concerning the processing,
- right to rectification,
- right to restriction of processing,
- right to erasure,
- right to object,
- right to portability.

If you wish to exercise your rights, this will involve your identification and the Data Controller will need to communicate with you. For this purpose, identification will require the provision of personal data (but identification may only be based on data that the Controller already holds about you) and your complaint about the processing will be available on the Controller's email account within the time period specified in this Notice in relation to complaints.

The Controller will respond to complaints about processing within 30 days at the latest.

Right to withdraw consent

You have the right to withdraw your consent to data processing at any time, in which case the data will be deleted from our systems.

Access to personal data

You have the right to receive feedback from the Data Controller on whether your personal data is being processed and, if it is being processed, you have the right to access the processed personal data and to be informed by the Data Controller of the following information in relation to:

- the purposes of the processing,
- the categories of personal data processed about you,
- the information about the recipients or categories of recipients to whom or with which the personal data have been or will be disclosed by the Controller,
- the envisaged period of storage of the personal data or, where this is not possible, the criteria for determining that period,
- your right to obtain from the Controller the rectification, erasure or restriction of the processing of personal data relating to you and, where the processing is based on legitimate interest, to object to the processing of such personal data,
- the right to lodge a complaint with a supervisory authority,
- if the data was not collected from you, any available information about its source,
- the fact of automated decision-making (where such a process is used), including profiling, and, at least in these cases, clear information about the logic used and the significance and likely consequences for you of such processing.

The purpose of exercising the right may be to ascertain and verify the lawfulness of the processing, and therefore, in the event of repeated requests for information, the Data Controller may charge reasonable compensation for the provision of information.

Access to personal data shall be ensured by the Controller by sending you, by email, the personal data and information processed, after you have identified yourself.

Please indicate in your request whether you want access to the personal data or information about the processing.

Right to rectification

You have the right to have inaccurate personal data relating to you corrected by the Data Controller without delay upon your request.

Right to restriction of processing

You have the right to have the Controller restrict processing at your request if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Controller to verify the accuracy of the personal data, if the accuracy can be established immediately, no restriction will be imposed,
- the processing is unlawful, but you object to the erasure of the data for any reason (for example, because the data are important to you for the purposes of pursuing a legal claim), and you do not want the data erased but instead want the data restricted,
- the Data Controller no longer needs the personal data for the purposes for which they are processed, but you require them for the establishment, exercise or defence of legal claims,
- You have objected to the processing, but the Controller may also have a legitimate interest in the processing, in which case, until it is established whether the legitimate grounds of the Controller prevail over your legitimate grounds, the processing must be restricted.

If the processing is restricted, such personal data, except for storage, may be processed only 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 of an important public interest of the Union or of a Member State.

The Data Controller shall inform you in advance (at least 3 working days before the restriction is lifted) of the lifting of the restriction on processing.

Right to erasure, forgetting

You have the right to obtain from the Data Controller the erasure of personal data concerning you 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 by the Controller,
- You withdraw your consent and there is no other legal basis for the processing,
- You object to processing based on legitimate interest and there is no overriding legitimate ground (i.e. legitimate interest) for the processing,

- the personal data were unlawfully processed by the Controller and this has been established on the basis of the complaint,
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject.

If the Controller has disclosed personal data about you for any lawful reason and is required to delete it for any of the reasons set out above, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform other controllers that you have requested the deletion of the links to or copies of the personal data in question.

Erasure does not apply where the processing is necessary:

- to exercise the right to freedom of expression and information,
- to comply with an obligation under Union or Member State law that requires the controller to process personal data (such as processing in the context of invoicing, where the storage of the invoice is required by law) or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller,
- for the establishment, exercise or defence of legal claims (e.g. if the Data Controller has a claim against you and has not yet satisfied it).

Right to object

You have the right to object to the processing of your personal data based on legitimate interests at any time on grounds relating to your particular situation. In such a case, the Controller may no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data may no longer be processed for those purposes.

Right to portability

If the processing is automated or based on your voluntary consent, you have the right to request the Data Controller to provide you with the data you have provided to the Data Controller, which the Data

Controller will make available to you in xml, JSON or csv format. If technically feasible, you may request that the Controller transmit the data in this format to another controller.

Automated decision-making

You have the right not to be subject to a decision based solely on automated processing (including profiling) that would have legal effects concerning you or similarly significantly affect you. In such cases, the controller must take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right to obtain human intervention by the controller, to express his or her point of view and to object to the decision.

The above does not apply if the decision:

- is necessary for the conclusion or performance of a contract between you and the Data Controller
- is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or is based on your explicit consent.
- Registration in the Data Protection Register Pursuant to the provisions of the Data Protection Act, the Data Controller was required to register certain of its data processing activities in the Data Protection Register. This notification obligation ceased as of 25 May 2018.

Data security measures

The Data Controller declares that it has implemented appropriate security measures to protect personal data against unauthorised access, alteration, disclosure, transmission, erasure or destruction, accidental destruction or damage and inaccessibility resulting from changes in the technology used.

The Data Controller will make every effort, within its organisational and technical possibilities, to ensure that its data processors also take appropriate data security measures when working with your personal data.

Legal remedies

If you believe that the Data Controller has violated a legal provision on data processing or has failed to comply with a request, you may initiate an investigation procedure with the National Authority for

Data Protection and Freedom of Information (address: 1363 Budapest, PO Box 9, e-mail: ugyfelszolgalat@naih.hu).

You are also informed that in case of violation of the legal provisions on data processing or if the Data Controller has not complied with any of your requests, you may bring a civil action against the Data Controller before a court.

Amendments to the Privacy Notice

The Data Controller reserves the right to amend this Privacy Notice in a way that does not affect the purpose and legal basis of the processing. By using the website after the amendment comes into force, you accept the amended privacy notice.

If the Data Controller wishes to carry out further processing of the data collected for purposes other than those for which they were collected, it will inform you of the purposes of the processing and the information below before carrying out the further processing:

- the duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration,
- your right to request the Data Controller to access, rectify, erase or restrict the processing of personal data concerning you and, in the case of processing based on legitimate interest, to object to the processing of personal data and, in the case of processing based on consent or a contractual relationship, to request the right to data portability,
- where the processing is based on consent, that you can withdraw your consent at any time,
- the right to lodge a complaint with a supervisory authority,
- whether the provision of the personal data is based on a legal or contractual obligation or is a precondition for the conclusion of a contract, whether you are under an obligation to provide the personal data and the possible consequences of not providing the data,
- the fact of automated decision-making (where such a process is used), including profiling, and, at least in these cases, clear information about the logic used and the significance and likely consequences for you of such processing.

The processing can only start after that. Where the legal basis for processing is consent, you must give your consent to the processing in addition to the information.

This document contains all relevant information on data management in relation to the operation of the website in accordance with the General Data Protection Regulation of the European Union 2016/679 (hereinafter referred to as the GDPR) and the Info Law.