

Privacy Policy

Privacy Policy

What is the purpose of this Privacy Policy?

We have adopted this Privacy Notice to provide natural persons and representatives of legal entities who use our services (hereinafter: Users) with all material information in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and to assist Users in exercising the rights described in Section 4. Our services are available at www.tickless.com.

Our obligation to provide information is based on Article 12 of Regulation (EU) 2016/679 of the European Parliament and of the Council, applicable from 25 May 2018 (hereinafter: the [GDPR](#)); Section 16 of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: the [Information Act](#)); and Section 4 of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (the [E-Commerce Act](#)).

This Privacy Notice has been prepared with regard to the GDPR, the Information Act and other laws relevant to the individual processing activities. The laws are listed in Appendix 10.1, the main definitions are set out in Appendix 10.2, and the individual rights of data subjects are described in detail in Appendix 10.3.

In preparing and applying this Privacy Notice, we have taken account of the [recommendation](#) of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements for prior information, as well as Article 5 of the GDPR, particularly the principle of accountability in Article 5(2).

We also monitor European Union practice concerning the protection of personal data. Accordingly, we incorporate the content of the European Commission's Article 29 Working Party [Guidelines on Transparency](#) into our data processing practices.

Details of the Data Controller

Name: ProtectOne Korlátolt Felelősségű Társaság

Registered office: 1021 Budapest, Völgy utca 5/a

Company registration number: 01-09-944010

Tax number: 22797933-2-41

Email address: info@tickless.com

Individual data processing activities

This section describes the material circumstances of each processing activity that the GDPR and other sector-specific laws require every data controller to disclose.

Data processing related to newsletters

Visitors to our Website may subscribe to our newsletter so that we can provide them with up-to-date information. The following information applies to this processing activity.

Personal data processed and purposes of processing

Personal data Purpose of processing Legal basis for processing

First name	Enables us to address the User personally in our newsletter	User's consent (Article 6(1)(a) GDPR)
Email address	Provides the User's electronic contact details to which we can send the newsletter	User's consent (Article 6(1)(a) GDPR)

Legal basis for processing

The User's consent (Article 6(1)(a) GDPR and Section 6(1) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities, hereinafter: the [Advertising Act](#)).

Duration of processing

We process the personal data provided until consent is withdrawn. The User may withdraw consent at any time by clicking the "Unsubscribe" button in a newsletter. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Method of processing

Electronically.

Contact and correspondence

Users may contact us through our Website for any purpose. We also process the personal data of our business partners' contact persons in the course of our work. Details of the related processing are set out below.

Personal data processed and purposes of processing

Personal data Purpose of processing Legal basis for processing

Name	Identifying the User or our business partner's contact person	User's consent (Article 6(1)(a) GDPR); in the case of a business partner, legitimate interests (Article 6(1)(f) GDPR)
Email address	Contacting and corresponding with the User or our business partner's contact person	User's consent (Article 6(1)(a) GDPR); in the case of a business partner, legitimate interests (Article 6(1)(f) GDPR)
Telephone number	Contacting and corresponding with the User or our business partner's contact person	User's consent (Article 6(1)(a) GDPR); in the case of a business partner, legitimate interests (Article 6(1)(f) GDPR)

Legal basis for processing

The User's consent to processing their personal data for the purposes set out in Section 3.2.1, given voluntarily through an affirmative action when making contact, such as calling us or sending an email (Article 6(1)(a) GDPR).

If we use a User's data for a purpose other than that for which it was originally collected, we will inform the User and obtain their prior express consent, or give them an opportunity to prohibit that use (see Section 9.1).

We process the above personal data of our business partners' contact persons on the basis of our and our business partners' legitimate interests (Article 6(1)(f) GDPR). Both parties have a legitimate interest in effective business communication when using the Website and discussing partnership matters, and in being able to inform each other's designated representative of any material

circumstance affecting a contract between us. Processing does not infringe the contact person's right to informational self-determination because facilitating communication between the parties and providing personal data for this purpose forms part of their employment or contractual duties. Our business partner's contact person may object to this processing.

Duration of processing

We process personal data provided on the basis of consent until consent is withdrawn. The User may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

We process the personal data of our business partners' contact persons for as long as necessary for communication and as permitted by the relevant laws: for five years from performance or termination of the contract under Act V of 2013, or for eight years from issuance of the invoice under Act C of 2000.

Method of processing

Electronically.

Data processing related to orders

Various products may be ordered through our Website. This section describes the related processing activities.

Personal data processed and purposes of processing

Personal data	Purpose of processing	Legal basis for processing
Name	Identifying the person ordering the product when fulfilling the order	Performance of a contract (Article 6(1)(b) GDPR); where the customer is a legal entity, legitimate interests (Article 6(1)(f) GDPR)
Residential address (postal code, city, street name and house number)	Sending the ordered product to the address provided	Performance of a contract (Article 6(1)(b) GDPR)
Telephone number	Contacting the customer and providing information about the order	Performance of a contract (Article 6(1)(b) GDPR); where the customer is a legal entity, legitimate interests (Article 6(1)(f) GDPR)
Email address	Contacting the customer and providing information about the order	Performance of a contract (Article 6(1)(b) GDPR); where the customer is a legal entity, legitimate interests (Article 6(1)(f) GDPR)

Legal basis for processing

Performance of a contract between the Data Controller and the User (Article 6(1)(b) GDPR).

Where the customer is a legal entity, the legal basis for processing the above personal data of its contact person is the legitimate interests of the Data Controller and the customer (Article 6(1)(f) GDPR). Both parties have a legitimate interest in effective business communication during the order process and in being able to inform each other's designated representative of any material circumstance affecting their contract. Processing does not infringe the customer's contact person's right to informational self-determination because facilitating communication between the parties and providing personal data for that purpose forms part of their employment or contractual duties.

Duration of processing

For eight years after issuance of the accounting document relating to the contract (Section 169(1) of the Accounting Act, with regard to Section 166(6) of that Act).

Personal data that is not required to fulfil accounting obligations is retained for five years after fulfilment of the order for the purposes described above, with regard to Section 6:22(1) of Act V of 2013 on the Civil Code (the [Civil Code](#)).

Method of processing

Electronically.

Provision of personal data

Because we cannot fulfil orders without the personal data described in this section, providing it is a prerequisite for concluding a contract.

Data processing related to invoicing

After fulfilling an order, we issue an accounting document in accordance with Act C of 2000 on Accounting (hereinafter: the [Accounting Act](#)). Details of the related processing are set out below.

Personal data processed and purposes of processing

Personal data	Purpose of processing	Legal basis for processing
Name	Supporting the accounting record of fulfilment of the order as an economic transaction	Processing required by law: Article 6(1)(c) GDPR, Section 5(1)(b) of the Information Act and Section 166(1)–(3) of the Accounting Act
Residential address, or registered office in the case of a sole trader (postal code, city, street name and house number)	Supporting the accounting record of fulfilment of the order as an economic transaction	Processing required by law: Article 6(1)(c) GDPR, Section 5(1)(b) of the Information Act and Section 166(1)–(3) of the Accounting Act
Tax number of a sole trader	Supporting the accounting record of fulfilment of the order as an economic transaction	Processing required by law: Article 6(1)(c) GDPR, Section 5(1)(b) of the Information Act and Section 166(1)–(3) of the Accounting Act

Legal basis for processing

Processing required by law: Article 6(1)(c) GDPR, with regard to Section 5(1)(b) of the Information Act and Section 166(1)–(3) of the Accounting Act.

Duration of processing

For eight years after issuance of the accounting document (Section 169(1) of the Accounting Act, with regard to Section 166(6) of that Act).

Method of processing

Electronically.

We retain electronically issued documents in accordance with the [rules on digital archiving](#), using a method that ensures all information in a document can be reproduced without delay, remains continuously readable and cannot subsequently be altered.

Provision of personal data

Because we cannot issue an accounting document without the personal data described in this section, its provision is required by law.

Data processing related to complaint handling

Users may contact us by email or telephone to ask questions or make complaints. Details of the related processing are set out below.

Personal data processed and purposes of processing

Personal data Purpose of processing Legal basis for processing

Name	Identifying the User	Processing required by law: Article 6(1)(c) and 6(2) GDPR, Section 5(1)(b) of the Information Act and Act CLV of 1997
Email address	Contacting and informing the User	Processing required by law: Article 6(1)(c) and 6(2) GDPR, Section 5(1)(b) of the Information Act and Act CLV of 1997
Telephone number	Contacting and informing the User	Processing required by law: Article 6(1)(c) and 6(2) GDPR, Section 5(1)(b) of the Information Act and Act CLV of 1997

Legal basis for processing

Processing required by law: Article 6(1)(c) and 6(2) GDPR, with regard to Section 5(1)(b) of the Information Act and Act CLV of 1997 on Consumer Protection (the [Consumer Protection Act](#)).

Duration of processing

For three years from receipt of the complaint, with regard to Section 17/A(7) of the Consumer Protection Act.

Method of processing

Electronically.

Data processing related to handling statutory defect and warranty claims

If a User asserts a statutory claim concerning defects in goods sold under the Civil Code, whether a claim against the seller or a product liability claim (hereinafter: a statutory defect claim), or a warranty claim to which they are entitled by law (hereinafter: a warranty claim), we are required to draw up a record under Decree 19/2014 (IV.29.) NGM on the procedural rules for handling statutory defect and warranty claims concerning goods sold under contracts between consumers and businesses (hereinafter: the "[NGM Decree](#)"). Details of the related processing are set out below.

Personal data processed and purposes of processing

Personal data Purpose of processing Legal basis for processing

Name	Identifying the User	Processing required by law: Article 6(1)(c) and 6(2) GDPR, Section 5(1)(b) of the Information Act and Section 4(1) of the NGM Decree
Address	Identifying the User	Processing required by law: Article 6(1)(c) and 6(2) GDPR, Section 5(1)(b) of the Information Act and Section 4(1) of the NGM Decree
Information concerning consent to data processing	Drawing up a record	Processing required by law: Article 6(1)(c) and 6(2) GDPR, Section 5(1)(b) of the Information Act and Section 4(1) of the NGM Decree

Legal basis for processing

Processing required by law: Article 6(1)(c) and 6(2) GDPR, with regard to Section 5(1)(b) of the Information Act and Section 4(1) of the NGM Decree.

Duration of processing

For three years from the date the record is drawn up, with regard to Section 4(1) and (6) of the NGM Decree.

Method of processing

Electronically.

What rights do Users have?

It is important to us that our processing meets the requirements of fairness, lawfulness and transparency. This section briefly introduces the rights of data subjects. They are explained in more detail in Appendix 3 to this Privacy Notice.

Users may request information about the processing of their personal data free of charge, access that data and receive a copy. In the cases specified by law, they may request rectification, erasure, blocking or restriction of processing, and may object to processing. Users may send information requests and the requests described in this section to the contact details in Section 2.

Right of access

A User may obtain confirmation from us as to whether we process their personal data. They may access that data and details of its processing and receive a copy of the personal data we process.

Right to rectification

At the User's request, we will rectify inaccurate personal data concerning them without undue delay. The User may also request that incomplete personal data be completed, including by means of a supplementary statement.

Right to erasure

At the User's request, we will erase personal data concerning them if we no longer need to process it, if they withdraw consent or object to processing, or if the processing is unlawful.

Right to be forgotten

At the User's request, we will endeavour to notify every data controller who has obtained, or may have obtained, access to the User's personal data made public of the User's request for erasure.

Right to restriction of processing

At the User's request, we will restrict processing if the accuracy of the personal data is contested, the processing is unlawful, the User objects to processing, or we no longer need the personal data provided.

Right to data portability

A User may receive the personal data concerning them that they have provided in a structured, commonly used and machine-readable format and may transmit that data to another data controller.

Right to object

A User may object at any time, on grounds relating to their particular situation, to processing of their personal data based on legitimate interests (see Sections 3.1, 3.2 and 3.3). In that case, we may no longer process the personal data unless we demonstrate compelling legitimate grounds that override the User's interests, rights and freedoms, or grounds relating to the establishment, exercise or defence of legal claims. As a general rule, following an objection the personal data may no longer be processed for that purpose.

Responding to requests

We will examine a request as soon as possible after its submission, and no later than 30 days afterwards—or 15 days in the case of an objection—and decide whether it is justified. We will notify the applicant of our decision in writing. If we do not fulfil a User's request, our decision will state the factual and legal reasons for its rejection.

Available remedies

The protection of personal data is important to us, and we respect Users' right to informational self-determination. We therefore endeavour to respond properly and on time to every request. We ask Users to contact us with any complaint or question before pursuing a claim before an authority or court, so that we can resolve any concerns promptly.

If contacting us does not resolve the matter, the User may:

- enforce their rights before a court under Act V of 2013 on the Civil Code. Proceedings may also be brought before the regional court with jurisdiction over the User's place of residence or stay. A list of regional courts and their contact details is available at <https://birosag.hu/torvenyszekek>; and
- lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information under the Information Act (address: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf. 9.; telephone: +36-1-391-1400; fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu; website: <https://naih.hu/>; hereinafter: NAIH).

Our procedure for requests to exercise rights

Notification of recipients

We notify every recipient to whom we have disclosed the User's personal data of any rectification, erasure or restriction of processing, unless doing so proves impossible or involves disproportionate effort. At the User's request, we will inform them of those recipients.

Form and timing of information

We provide information about measures taken in response to requests relating to Section 4 within one month of receiving the request, electronically unless the User requests otherwise. If necessary, this period may be extended by a further two months, taking into account the complexity and number of requests. We will notify the User of the extension and its reasons within one month of receiving the request.

Information may also be provided orally at the User's request, provided they verify their identity by other means.

If we do not take action on a request, we will inform the User of the reasons within one month of receiving it and explain that they may lodge a complaint with NAIH and seek a judicial remedy (Section 4.9).

Verification

In exceptional cases, if we have reasonable doubts about the identity of the natural person making a request, we will ask for additional information needed to confirm their identity. This measure is necessary to support the confidentiality of processing under Article 5(1)(f) GDPR and to prevent unauthorised access to personal data.

Costs of information and measures

We provide information in response to requests relating to Section 4 and take the corresponding measures free of charge.

If a User's request is manifestly unfounded or excessive, particularly because of its repetitive nature, we may charge a reasonable fee reflecting the administrative cost of providing the requested information or taking the requested action, or refuse to act on the request.

Possible recipients of personal data and data processors

In connection with operation of the Website

The hosting provider, acting as a data processor, may access personal data provided when the Website is used.

Name: Websupport Magyarország Kft.

Contact: info@tarhelypark.hu

In connection with newsletters

Newsletter software is used to send newsletters from the Website. Its operator acts as a data processor engaged by us. Its details are:

Name: The Rocket Science Group

Contact: <https://mailchimp.com/>

In connection with delivery of ordered products

We engage courier companies as data processors to deliver ordered products. Their details are:

6.3.1.

Name: **GLS General Logistics Systems Hungary Csomag-Logisztikai Kft.**

Contact: <https://gls-group.com/HU/en/home/>

6.3.2.

Name: Magyar Posta Zrt.

Contact: <https://www.posta.hu/>

In connection with payment for orders

The price of an order may be paid through a banking service provider's interface. The data processors are:

Name: PayPal (Europe) S.à r.l. et Cie, S.C.A

Contact: www.paypal.com

Name: Stripe, Inc.

Contact: <https://stripe.com/>

In connection with invoicing

The data processor we engage for invoicing receives the personal data Users provide for that purpose. Its details are:

Name: KBOSS.hu Kft.

Contact: www.szamlazz.hu

Data security

Taking into account the state of the art and the cost of implementation; the nature, scope, context and purposes of processing; and the risks of varying likelihood and severity to the rights and freedoms of natural persons, we implement appropriate technical and organisational measures both when determining how data will be processed and during processing. These measures are intended to implement data protection principles effectively, such as data minimisation, and to integrate the safeguards needed to meet GDPR requirements and protect data subjects' rights.

Organisational measures

We grant access to our IT systems through permissions assigned to identifiable individuals. Access is granted according to the principle of necessary and sufficient rights: each employee may use our IT systems and services only to the extent required for their duties, with the appropriate permissions and for the necessary period. Access to IT systems and services may be granted only to persons who are not subject to restrictions for security or other reasons, such as conflicts of interest, and who have the professional, business and information security knowledge needed to use them safely.

Technical measures

We make every effort to ensure that our IT equipment and software continue to meet technological standards generally accepted in the market.

In developing our systems, we provide for logging so that operations can be monitored and traced and incidents, such as unauthorised access, can be detected.

Our server is located on an isolated, dedicated server provided by our hosting provider and is protected and secured.

Taking account of the relevant NAIH [recommendation](#), we use the *HTTPS protocol* on the Website, which provides a higher level of data security than the *HTTP protocol*.

Cookies

To ensure that our Website functions properly, we sometimes place small data files on the User's device, as most modern websites do.

What is a cookie?

A cookie is a small text file that a website places on a User's device, including a mobile phone. It allows the website to "remember" the User's settings, such as language, font size and display preferences, so that they do not have to set them again each time they visit our Website.

The cookies used on the Website are listed below:

Cookie source Cookie name Cookie function Cookie expiry

WordPress	elementor	Used by the website's WordPress theme. It allows the website owner to edit or publish content in real time.	Never
CookieYes	cookieyes-consent	Used by CookieYes to remember Users' consent preferences on subsequent visits. It does not collect or store personal data about website visitors.	1 year
WooCommerce	woocommerce_items_in_cart	Records whether any items are in the WooCommerce cart.	Session
WooCommerce	woocommerce_cart_hash	Determines whether the contents or data of a cart have changed.	Session
WooCommerce	wp_woocommerce_session_	Creates a unique code for each customer so that WooCommerce can locate that customer's cart data in the database.	2 days, 1 minute
Stripe	__stripe_mid	Used by Stripe to process payments.	1 year
Stripe	__stripe_sid	Used by Stripe to process payments.	1 hour
Mailchimp	mailchimp_landing_site	Records the first page visited by the User.	1 month
Polylang	pll_language	Remembers the User's selected language on return visits and obtains language information if it is not otherwise available.	1 year
PixelYourSite	pys_session_limit	Set by the PixelYourSite plugin to manage analytics services.	1 hour
PixelYourSite	pys_start_session	Set by the PixelYourSite plugin to manage analytics services.	Session
	_ga	Used by Google Analytics to calculate visitor, session and campaign data and track website use for analytics reports. It stores information anonymously and assigns a randomly generated number to identify individual Users.	1 year, 1 month, 4 days
Google	_ga_	Set by Google Analytics to store and count page views.	1 year, 1 month, 4 days
Google	_gcl_au	Used by Google Tag Manager to assess the effectiveness of advertising on websites using its services.	3 months
		Used by Google Analytics to store information about how visitors use the	

Google	_gid	website and produce an analytics report on website performance. The 1 day information collected may include the number of visitors, their sources and pages visited, in anonymised form.	
Google	_gat_gtag_UA_*	Set by Google Analytics to store a unique User ID.	1 minute
Hotjar	_hjSessionUser_*	Assigns information from later visits to the same website to the same User ID, which is retained in a Hotjar User ID unique to that website.	1 year
Hotjar	_hjSession_	Assigns information from later visits to the same website to the same User ID, which is retained in a Hotjar User ID unique to that website.	1 hour
PixelYourSite	pys_first_visit	Set by the PixelYourSite plugin to manage analytics services.	7 days
PixelYourSite	pysTrafficSource	Set by the PixelYourSite plugin to manage analytics services.	7 days
PixelYourSite	pys_landing_page	Set by the PixelYourSite plugin to manage analytics services.	7 days
PixelYourSite	last_pysTrafficSource	Set by the PixelYourSite plugin to manage analytics services.	7 days
PixelYourSite	last_pys_landing_page	Set by the PixelYourSite plugin to manage analytics services.	7 days
Facebook	_fbp	Used by Facebook to display advertisements on Facebook or a digital platform carrying Facebook ads after a visit to the website.	7 days
doubleclick.net	test_cookie	Determines whether the User's browser supports cookies.	15 minutes
YouTube	YSC	Tracks views of videos embedded from YouTube.	Session
YouTube	VISITOR_INFO1_LIVE	Measures bandwidth and determines whether the User receives the new or old player interface.	6 months
YouTube	VISITOR_PRIVACY_METADATA	Stores the User's cookie consent status for the current domain.	6 months
YouTube	PREF	Stores User preferences, such as language, search-result format and other customisations for YouTube videos embedded on various websites.	8 months
Google	IDE	Stores information about how the User uses the website so that Google DoubleClick can display advertisements suited to the User's profile.	1 year, 24 days
Not available	pbid	No description available.	6 months
Not available	cookies.js	No description available.	Session
Not available	m	No description available.	1 year, 1 month, 4 days, 1 minute

These cookies can be deleted or blocked, but the Website may then fail to function properly.

We do not use cookies to identify the User personally. They serve only the purposes described above.

How can cookies be managed?

Cookie files can be deleted (see www.AllAboutCookies.org) or blocked in most modern browsers. In that case, however, certain settings may need to be selected again whenever the Website is used, and some services may not function.

Detailed information on deleting and blocking cookies is available in English at www.AllAboutCookies.org and at the following browser-specific links:

- [Firefox](#)
- [Google Chrome](#)
- [Microsoft Edge](#)

Google Analytics

1. The Website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files saved on the User's computer to help analyse how the User uses the Website.
2. Information generated by the cookies about the User's use of the Website is generally transferred to and stored on a Google server in the United States. If IP anonymisation is activated on the Website, Google first truncates the User's IP address within Member States of the European Union or other states that are party to the Agreement on the European Economic Area.
3. Only in exceptional cases is the full IP address transferred to a Google server in the United States and truncated there. Google uses this information on our behalf to evaluate the User's use of the Website, prepare reports on Website activity for us and provide other services relating to Website and internet use.
4. Google does not combine the IP address transmitted by the User's browser as part of Google Analytics with other Google data. The User may prevent cookies from being stored by changing the appropriate browser settings. Please note, however, that some Website functions may then be unavailable or limited. The User may also prevent Google from collecting and processing data generated by cookies concerning their use of the Website, including their IP address, by downloading and installing the browser plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

Facebook Pixel

Facebook Custom Audience is an internet analytics and advertising service provided by Facebook, Inc. ("Facebook"). It enables the Data Controller to obtain information about how visitors use the Website. Further information about Facebook Custom Audience and Facebook Pixel cookies is available at <https://www.facebook.com/policies/cookies/>.

The Facebook Pixel service requires cookies to be placed on Users' devices. We use Facebook Pixel on the Website for both advertising and Website analytics. Facebook Pixels place cookies on devices used to browse the Website. Their purposes include creating appropriate advertising audiences, measuring conversions across devices, targeting and optimising advertisements for the appropriate audience, displaying personalised advertisements, and preparing reports and statistics about visits to the Website and application.

Users may manage Facebook's related processing activities through their Facebook and Google accounts and may allow the collection of data through Facebook cookies on the Website. After logging into Facebook, Users may view these cookies in Facebook Ads Settings and set or change their cookie preferences there. On the Website, Users may give consent to cookies grouped by type.

Other provisions

Processing for a different purpose

If we intend to use data provided for a purpose other than the purpose for which it was originally collected, we will inform Users and

obtain their prior express consent, or give them the opportunity to prohibit that use.

Record-keeping obligation

We maintain records of the processing activities for which we are responsible in accordance with Article 30 GDPR.

Personal data breaches

A personal data breach is a security breach leading to the accidental or unlawful destruction, loss or alteration of personal data processed, or to its unauthorised disclosure or access. In the event of a personal data breach, we must act in accordance with Articles 33 and 34 GDPR. We keep records of personal data breaches, including the relevant facts, their effects and the measures taken to remedy them.

Amendments

We may amend this Privacy Notice unilaterally at any time. If we amend it, we retain earlier versions and, where possible and appropriate, draw data subjects' attention to the amended provisions.

Effective: September 2024

ProtectOne Kft.

Data Controller

Appendices

Appendix: Applicable laws

When preparing this Privacy Notice, the Data Controller took account of applicable laws and important international recommendations, particularly:

- 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 (GDPR);
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Information Act);
- Act V of 2013 on the Civil Code (Civil Code);
- Act CXXX of 2016 on the Code of Civil Procedure;
- Act C of 2000 on Accounting (Accounting Act);
- Act CLV of 1997 on Consumer Protection (Consumer Protection Act);
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (E-Commerce Act).

Appendix: Terms relating to the processing of personal data

- **Data controller:** the legal person that determines the purposes and means of processing personal data.
- **Processing:** any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, including 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.
- **Data transfer:** making data available to a specified third party.
- **Data erasure:** making data unrecognisable in a manner that prevents their restoration.
- **Data marking:** attaching an identifying mark to data in order to distinguish them.
- **Restriction of processing:** marking stored personal data with the aim of limiting their processing in the future.
- **Data destruction:** the complete physical destruction of a medium containing data.
- **Data processor:** a legal person that processes personal data on behalf of a data controller.
- **Recipient:** a natural or legal person, public authority, agency or other body to which personal data is disclosed, whether or not it is a third party.
- **Cookie:** a small data packet (text file) sent by a web server and placed on a User's computer for a specified time. Depending on its nature, the server may add to it during subsequent visits. If a browser sends back a previously stored cookie, the service provider handling that cookie may link the User's current visit with earlier visits, but only in relation to the content of that cookie.
- **Data subject/User:** an identified or identifiable natural person. An identifiable natural person is one who can be identified directly or indirectly, particularly by reference to an identifier such as a name, number, location data or online identifier, or to one or more factors specific to that person's physical, physiological, genetic, mental, economic, cultural or social identity.
- **Third party:** a natural or legal person, public authority, agency or other body other than the data subject, data controller, data processor or persons authorised to process personal data under the direct authority of the controller or processor.
- **Consent of the data subject:** any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they signify agreement to the processing of personal data concerning them, by a statement or clear affirmative action.
- **IP address:** in networks using the TCP/IP protocol, servers have IP addresses, or identification numbers, enabling their identification on the network. Every computer connected to a network has an IP address through which it can be identified.
- **Personal data:** any information relating to a data subject.
- **Objection:** a statement by a data subject objecting to the processing of their personal data and requesting that processing cease or the processed data be erased.

Appendix: Data subjects' rights

Access

A User may request access to their personal data processed by us through any of our contact channels. We will provide information about:

- whether their personal data is being processed;
- the purposes of processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data has been or will be disclosed;
- the planned period of storage;
- their rights;
- available remedies; and
- the sources of the data.

The User may also request a copy of their personal data undergoing processing. In that case, we provide the personal data in a structured, commonly used and machine-readable format (PDF/XML), or as a printed paper copy. The copy is provided free of charge.

Rectification

A User may request, through our contact channels, that we rectify inaccurate personal data concerning them and complete

incomplete data. If we do not have the information needed to correct or complete inaccurate information, we may ask the User to provide supplementary information and verify its accuracy. Until the data can be corrected or completed because the supplementary information is unavailable, we restrict processing of the personal data concerned and temporarily suspend operations on it other than storage.

Erasure

A User may request, through our contact channels, that we erase personal data concerning them if either of the following applies:

- we no longer need the data; or
- the User has concerns about the lawfulness of our processing of their data.

If, following a User's request, we determine that we are obliged to erase personal data we process, we will cease processing it and destroy the personal data previously processed. An obligation to erase personal data may also arise following withdrawal of consent, exercise of the right to object or a legal obligation.

Restriction of processing

A User may request, through our contact channels, that we restrict processing of personal data concerning them if:

- they have concerns about the lawfulness of processing and request restriction instead of erasure; or
- we no longer need the data, but the User requires it for the establishment, exercise or defence of legal claims.

We automatically restrict processing if the User contests the accuracy of personal data or exercises the right to object. In that case, the restriction lasts for the period needed to verify the data's accuracy or, following an objection, to determine whether the conditions for continuing processing are met.

While processing is restricted, the personal data concerned may be stored but otherwise processed only:

- with the data subject's consent;
- for the establishment, exercise or defence of legal claims;
- to protect the rights of another natural or legal person; or
- for reasons of important public interest.

We will inform Users before lifting the restriction.

Data portability

A User may request, through our contact channels, that we provide the personal data concerning them that we process so they can use it further as they choose. They may also ask us to transmit it to another data controller they designate.

This right is limited to personal data the User provided to us that we process to perform their contract. Other data cannot be transferred under this right. We provide the personal data in a structured, commonly used and machine-readable format (PDF/XML), or as a printed paper copy.

Exercising this right does not automatically erase the personal data from our systems. The User may contact us again or continue communicating with us after the data has been transferred.

Objection

A User may object at any time, through our contact channels, to processing of their personal data for the purposes specified in Sections 3.1, 3.2 and 3.3 of this Privacy Notice. We will then assess whether processing is justified by compelling legitimate grounds that override the User's interests, rights and freedoms, or grounds relating to the establishment, exercise or defence of legal claims. If such grounds exist, we will continue processing the personal data. Otherwise, we will cease processing it.