

## Privacy policy

### 1. INTRODUCTION

In the course of its activities, DZstudio Informatikai Korlátolt Responsibility Társaság (hereinafter: Data Controller) pays particular attention to the protection of personal data, compliance with the mandatory legal provisions, and safe and fair data management.

Information of the Data Controller:

Company name: DZstudio Informatics Limited Liability Company

Headquarters: 7627 Pécs, Bokor u. 8/1.

Tax number: 23511398-2-02

The Data Controller handles the personal data made available in all cases in compliance with the current Hungarian and European legislation and ethical expectations, and in all cases takes the technical and organizational measures necessary for proper secure data management. These regulations have been developed on the basis of the following legislation in force:

- CXIX of 1995 TV. on the management of name and address data for the purpose of research and direct business acquisition
- CVIII of 2001 TV. on certain issues of electronic commercial services and services related to the information society
- XLVIII of 2008 TV. about the basic conditions and certain limitations of economic advertising activity
- Act CXII of 2011 on the right to self-determination of information and freedom of information
- Regulation 2016/679/EU (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, as well as on the repeal of Regulation 95/46/EC The Data Controller undertakes to unilaterally comply with these regulations and requests that its customers also accept the regulations. The data manager reserves the right to change the data protection policy, in which case the modified policy will be published publicly.

### 2. INTERPRETATION PROVISIONS

In our regulations, data protection technical terms have the following meaning:

Personal data: data that can be associated with any specific (identified or identifiable) natural person (hereinafter: data subject), the conclusion that can be drawn from the data regarding the data subject. During data processing, personal data will retain its quality as long as the relationship with the data subject can be restored. A person can be considered identifiable in particular if he can be identified - directly or indirectly - on the basis of a name, identification mark, or one or more factors characteristic of his physical, physiological, mental, economic, cultural or social identity.

Consent: the voluntary and firm declaration of the data subject's will, which is based on adequate information, and with which he gives his unequivocal consent to the processing of his personal data - in full or covering certain operations.

**Objection:** the statement of the data subject objecting to the processing of their personal data and requesting the termination of data processing or the deletion of the processed data.

**Data controller:** the natural or legal person or organization without legal personality who, independently or together with others, determines the purpose of data management, makes and implements decisions regarding data management (including the device used), or implements them with the Data Processor.

**Data management:** regardless of the procedure used, any operation performed on the data or the set of operations, including, in particular, collection, recording, recording, organization, storage, change, use, query, transmission, disclosure, coordination or connection, locking, deletion and destruction, and preventing further use of the data, taking photographs, audio or video recordings, and recording physical characteristics suitable for identifying the person.

**Data transmission:** making the data available to a specific third party.

**Disclosure:** making the data available to anyone.

**Data deletion:** rendering the data unrecognizable in such a way that its recovery is no longer possible.

**Data marking:** providing the data with an identification mark in order to distinguish it.

**Data blocking:** providing the data with an identification mark for the purpose of limiting its further processing permanently or for a specified period of time.

**Data destruction:** complete physical destruction of the data carrier containing the data.

**Data processing:** performing technical tasks related to data management operations, regardless of the method and tool used to perform the operations, as well as the place of application, provided that the technical task is performed on the data.

**Data processor:** a natural or legal person, or an organization without legal personality, who processes data on the basis of a contract - including a contract concluded under the provisions of the law.

**Data file:** the totality of the data managed in a register.

**Third party:** a natural or legal person, or an organization without legal personality, who is not the same as the data subject, the data controller or the data processor.

**EEA state:** a member state of the European Union and another state that is a party to the Agreement on the European Economic Area, as well as the state whose citizen is the European Union and its member states, as well as a state that is not a party to the Agreement on the European Economic Area, on the basis of the European Economic Area He enjoys the same legal status as a citizen of a state party to the Territorial Agreement.

**Third country:** any state that is not an EEA state.

**Data protection incident:** unlawful handling or processing of personal data, including in particular unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage.

### 3. PRINCIPLES OF DATA MANAGEMENT

Personal data can be processed if the person concerned consents to it, or if it is ordered by law or - based on the authority of the law, within the scope defined therein - by a local government decree.

Personal data may only be processed for a specific purpose, in order to exercise a right and fulfill an obligation. All stages of data management must comply with this purpose.

Only such personal data can be processed that is essential for the realization of the purpose of data management, is suitable for achieving the purpose, and only to the extent and for the time necessary for the realization of the purpose.

Personal data can be transferred, and different data processing can be linked, if the data subject has consented to it, or if the law allows it, and if the conditions for data processing are met for each individual piece of personal data.

Personal data may be transferred from the country to a data controller or data processor in a third country, regardless of the data carrier or the method of data transfer, if the data subject has expressly consented to it, or if it is permitted by law, and during the handling and processing of the transferred data in the third country. an adequate level of protection of personal data is ensured.

In the case of mandatory data management, the purpose and conditions of data management, the scope and accessibility of the data to be managed, the duration of data management, and the person of the data manager are determined by the law or local government decree ordering data management.

In the public interest, the law can order the disclosure of personal data by explicitly specifying the scope of the data. In all other cases, disclosure requires the consent of the data subject, or in the case of special data, written consent. In case of doubt, it must be assumed that the data subject did not give his consent.

The data subject's consent shall be deemed to be given with regard to the data communicated by the data subject during his public appearances or provided by him for the purpose of disclosure. In the procedure initiated at the request of the data subject, his consent to the processing of his necessary data must be assumed. The attention of the person concerned must be drawn to this fact. The data subject may also give his consent in the framework of a written contract with the Data Controller in order to fulfill the provisions of the contract. In this case, the contract must contain all information that the data subject must know from the point of view of the processing of personal data, in particular the definition of the data to be processed, the duration of the data processing, the purpose of use, the transmission of the data, the use of a data processor. The contract must clearly state that, by signing, the data subject consents to the processing of his/her data as specified in the contract.

The right to the protection of personal data and the personal rights of the person concerned cannot be violated by other interests related to data management, including the disclosure of data of public interest, unless the law makes an exception.

#### 4. FUNDAMENTALS OF DATA MANAGEMENT

In the course of its activities, the Data Controller handles personal data in all cases based on law or voluntary consent. In some cases, data management, in the absence of consent, is based on other legal bases or on Article 6 of the regulation.

The Data Controller uses the cooperation and services of the following Data Processors for its activities:

#### Newsletter

The Data Controller delivers online newsletters containing news, news and offers as well as electronic and direct marketing messages by mail to the subscribers to the newsletters of the websites it operates (also known as VIP members) usually once a month, but no more than once a day. To subscribe to the newsletter, you must enter your name and e-mail address, which is essential for the delivery of messages.

We process the data as long as the data subject does not request their deletion. The option to unsubscribe is provided by a direct link in every newsletter. The user is responsible for the authenticity of the personal data provided.

The data management related to the newsletter has been reported to the National Data Protection and Freedom of Information Authority, the data protection registration identification number of the data management: "reporting in progress"

## 5. SECURITY OF DATA MANAGEMENT

Website operator: DZstudio Informatikai Llátolt Responsibility Társaság

Headquarters: 7627 Pécs, Bokor u. 8/1.

The Data Controller protects the data in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage. Together with the server operators, the Data Controller ensures the security of the data with technical, organizational and organizational measures that provide a level of protection corresponding to the risks associated with data management.

## 6. RIGHTS OF THE DATA SUBJECTS

The data subject can request information about the management of his personal data, as well as request the correction or deletion of his personal data, with the exception of the data management mandated by law, at the link in the footer of the newsletters or at any contact point of the Data Controller. At the request of the data subject, the Data Controller provides information about the data it manages, the purpose, legal basis, duration of the data processing, the name, address (headquarters) of the data processor and its activities related to data processing, as well as about who and for what purpose the data is or has been received.

The Data Controller is obliged to provide the information free of charge in writing, in an understandable form, as soon as possible after the submission of the request, but no later than 25 days. The Data Controller must correct personal data that does not correspond to reality. Personal data will be deleted by the Data Controller if its processing is unlawful, if the data subject requests it, if it is incomplete or incorrect - and this state cannot be legally corrected - provided that the deletion is not precluded by law, if the purpose of data management has ceased, the deadline for data storage is defined by law has expired or has been ordered by the court or the data protection commissioner.

The correction and deletion will be notified to the data subject and to all those to whom the data was previously transmitted for the purpose of data management. The notification can be omitted if this does not harm the legitimate interests of the data subject in view of the purpose of the data management. The data subject may object to the processing of his/her personal data if the processing (transmission) of the personal data is necessary solely for the enforcement of the rights or legitimate interests of the data controller or the data recipient, unless the data processing is ordered by law, the use or transmission of the personal data is direct business acquisition, public opinion polling or for the purpose of scientific research, the exercise of the right to protest is otherwise permitted by law. The Data Controller - with the simultaneous suspension of data management - is obliged to examine the objection within the shortest period of time from the submission of the request, but no later than 15 days, and to inform the applicant of the result in writing. If the protest is justified, the data controller is obliged to terminate the data management - including further data collection and transmission - and to block the data, as well as to notify all those to whom the personal data affected by the protest was previously transmitted, about the protest and the measures taken based on it. are obliged to take measures to enforce the right to protest.

In the event of a violation of their rights, the data subject may appeal to the court or the data protection authority against the data controller. Legal remedies and complaints can be made at the following contacts:

Name: National Data Protection and Freedom of Information Authority

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: +3613911400

Fax: +3613911410

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

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

Permanent data deletion

You can read information about permanent data deletion under the Data deletion menu item.