

PRIVACY POLICY

This is a rough translation of PALOS RESORT's official, Hungarian language PRIVACY POLICY.

NLC Consulting Group Kft. (PALOS Resort owner and operator) (hereinafter referred to also as Controller) pays special attention to the business in activities in connection with personal data in accordance with the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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 (General Data Protection Regulation)) in accordance with its regulations, handle and store.

NLC Consulting Group Ltd., which operates the palosvendeghaz.hu, palosresort.com and palosresort.hu websites, is an accommodation service and catering company .

Relation to the management of the data, NLC Consulting Group Ltd. hereby informs PALOS Resort guests, as well as online booking service recipients (hereinafter: User) about data handling practices.

1. Data Manager

Data handling of the **NLC Consulting Group Kft** . performs.

Headquarters, mailing address: 1055 Budapest, Kossuth Lajos tér 18.

Phone: (06-1) 700-4410

Fax: (06-1) 700-4610

Email: info @ palosvendeghaz.hu

Tax ID: 13161617-2-41

Court of Registration: Budapest General Court as Court of Registration

Company Registration Number: 01-09-721687

Legislation underpinning data management

- Act CXII of 2011 on the Right of Information Self-Determination and on Freedom of Information (hereinafter: Information Act,
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free flow of such data and repealing Regulation 95/46 / EC (General Data Protection Regulation) (" Regulation ")
- Act XLVIII of 2008 on the General Conditions and Certain Limits of Economic Advertising Activities; law,
- Act C of 2000 on Accounting,
- Act CXXVII of 2007 on Value Added Tax, law,

2. GLOSSARY

- (a) **"controller"** shall mean the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of data processing are determined by Union or Member State law, the controller or the specific criteria for designating the controller may be defined by Union or Member State law;
- (b) **"personal data"** means any information relating to an identified or identifiable natural person ("data subject" for the purposes of this document: "Partner"); identifies a natural person who, directly or indirectly, in particular identifiers, such as name, number, location, online identification or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;

- (c) **"processing"** shall mean any operation or combination of operations carried out on an automated or non-automated basis in relation to the collection of personal data or files, including the collection, recording, filing, storage, conversion or alteration, retrieval, access, use, communication; otherwise made available, coordinated or linked, restricted, deleted or destroyed;
- (d) **"restriction of processing "** means the marking of stored personal data with the aim of limiting their processing in future;
- (e) **" data subject "** means any natural person identified or directly or indirectly identified on the basis of personal data ;
- f) **' s apcsolattartó "**acting on behalf of Partnership, available on the website recipient name and under the authority of the person Partner.
- g) **" p artner "** means any legal entity to which the Data Controller provides services or enters into a contractual relationship with the Controller ;
- (h) **"consent of the data subject"** means the voluntary, explicit and unambiguous expression of the will of the data subject, by which the data subject declares, by means of a statement or act unambiguously confirming that he or she consents to the processing of personal data concerning him or her;
- (i) **"profiling"** shall mean any form of automated processing of personal data for the purpose of assessing personal data relating to an individual, in particular with regard to work performance, economic situation, health, personal preference, interest, reliability, behavior, location or to analyze or predict movement-related characteristics ;
- (j) **"processor"** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- (k) **'recipient' shall** mean any natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not;
- (l) **"data incident"** means any breach of security which results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

3. DATA MANAGEMENT ACTIVITIES

The Partner gives his consent for each data processing by voluntarily providing contact data to the Data Controller (by business card, e-mail, partner data sheet or otherwise). The Data Controller publishes this Prospectus on its website. The Partner is thus introduced and peruse sa in this Privacy Prospectus, as well as the provisions contained therein to accept as binding and informed, strongly contributes to Controller voluntarily given in to the personal data reaches the objectives set out in this Prospectus treat Deke the Regulation and within the framework of this Privacy Policy.

Although the scope of the Regulation does not cover non-natural persons, legal persons require a natural person who can be contacted personally. Such persons, designated as contact persons, usually have a legal relationship (employment relationship, other employment relationship) with the legal person (and an organization without legal personality) and carry out their duties in this regard.

4. LEGAL BASIS OF DATA MANAGEMENT

Legal basis for data processing The European Parliament and the Council (EU) 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 95/46 / EC (General Data Protection Regulation) Article 6 (1) of Regulation No 2016/679 (the Regulation) provides:

The User's consent (Article 6 (1) (a) GDPR) provides the legal basis

- in the case of contractual partners who provide additional information beyond that which is necessary for the performance of the contract or which is required by law,
- as well as statistics that require User's consent for cookies used for this purpose.

The performance of the contract (Article 6 (1) (b) GDPR) provides the legal basis for:

- the data management is necessary for the performance of a contract in which the data subject is required to take action at the request of one of the parties or the data subject prior to the conclusion of the contract , ie the Data Controller for all services available on the Website under GTC (see eg .
- Compliance with a legal obligation (Article 6 (1) (c) of the GDPR) provides the legal basis for the issuance of own accounts: the Accounting Act (Act on Accounting) and

Article 6 (1) (b) and (f) of the GDPR provides the legal basis for data management based on the performance of the contract and its legitimate interest. It is a legitimate interest of the Data Controller towards the User to enforce any claim under the Contract. After the termination of the contract, the Civil Code the general limitation period is 5 years. The Data Controller following the termination of the contract shall be governed by the Civil Code. until the end of the limitation period under this Agreement, the contractual claim shall retain the data necessary for the enforcement of the interest as long as it is possible to assert the legitimate interest. (Exception to this rule: where those interests take precedence over the interests or fundamental rights and freedoms of the data subject which necessitate the protection of personal data, in particular if the child concerned)

The person designated as contact may object to the data processing by written notice to the Data Controller.

4.1. Daily Tender Notification Service (Subscription) - (Data Managed to Perform Online Contract)

4.1.1. The scope of the data processed and the purpose and legal basis of the data management

Personal data	Purpose of data management	Legal basis for data management
Name of Customer as Contact (Surname, First Name)	<p>Although the scope of the Regulation does not cover non-natural persons, legal persons require a natural person who can be contacted personally. So the purpose of data management is to keep in touch with the service you are ordering. (Such persons, designated as contact persons, generally have a legal relationship (employment, other employment relationship) with the legal person (and do not have a legal personality with this organization).)</p> <p>The Data Controller shall use this contact data solely for the purpose of fulfilling the contract entered into , contacting it and sending system messages .</p>	Pursuant to Article 6 (1) (b) of the Regulation, the execution of an online contract with the User as a customer.
E-mail address	<p>The e-mail address is essential for the User to receive and identify the database in order to provide the service . In addition</p> <ul style="list-style-type: none"> - required by sending a confirmation email to order the service - User will receive the ordered notification letters to this email 	Pursuant to Article 6 (1) (b) of the Regulation, the execution of an online contract with the User as a customer.

	address. sending system message (s) related to the service.	
Billing name: (Company name)	The name on the invoice for the value of the service. Providing the data is a prerequisite for entering into a contract and is essential for fulfilling the order (online contract).	Pursuant to Article 6 (1) (b) of the Regulation, the execution of an online contract with the User as a customer.
Billing address: (Postcode, city, street, house number)	Required to issue an invoice for the service order. Providing information is a prerequisite for entering into a contract, essential for fulfilling your order (online contract).	Pursuant to Article 6 (1) (b) of the Regulation, the execution of an online contract with the User as a customer.
Place and date of birth	Required for mandatory state records for reporting.	Pursuant to Article 6 (1) (b) of the Regulation, the execution of an online contract with the User as a customer.
Identification document number	Required for mandatory state records for reporting.	Pursuant to Article 6 (1) (b) of the Regulation, the execution of an online contract with the User as a customer.
phone number	A full contact number to keep in touch with your service order.	Pursuant to Article 6 (1) (a) of the Regulation, the User gives his voluntary consent, as the provision of data is not obligatory for the use of the Services.

An email address does not require you to include personal information, so for example, an email address does not require the User's name. The User is free to choose whether to enter an existing email address that contains information that identifies him or her.

Duration of data management, data erasure deadline: the contract's status for the duration of managed data Controller.

Data Source: Added directly from the Business User or his contact.

Possible Consequences of Failure to Provide Data : Failure to Perform Contract Given that Data Controller will not have the data to enable performance

4.2. Invoice issue

Personal data	Purpose of data management	Legal basis for data management
N years	Required content item for the invoice. account management, accounting preparation and registration.	Fulfillment of a legal obligation under Article 6 (1) (c) of the Regulation (under the Accounting Act and the VAT Act).
Title	Required content item for the invoice.	Fulfillment of a legal obligation pursuant to Article 6 (1) (c) of the Regulation.
Tax number (optional)	During which, as a taxable person, the supply of goods and services was performed.	Fulfillment of a legal obligation under Article 6 (1) (c) of the Ren delet.

Duration of Data Management: However, the data on the invoice must be retained by the Data Controller for 8 years.

Data Source: Recorded directly from the Business User or his affiliate.

Possible Consequences of Failure to Provide Data: The Data Controller will not be able to fulfill its legal obligations under the provisions of the Accounting Act and the VAT Act.

4.3. Data processed to enforce contract claims

Personal data	Purpose of data management	Legal basis for data management
Name of contractor	Legal claims arising after termination of the Contract or investigation of the User's claims arising from the Contract, and, if necessary, fulfillment in this interest are necessary.	Pursuant to Article 6 (1) (f) of the Regulation, the Data Controller has a legitimate interest in the processing of data.
E-mail address	It is necessary to enforce legal claims arising after the termination of the Contract or to investigate and, if necessary, fulfill the User's claims arising from the Contract.	Pursuant to Article 6 (1) (f) of the Regulation, the Data Controller has a legitimate interest in the processing of data.
Billing name: (Company name)	It is necessary to enforce legal claims arising after the termination of the Contract or to investigate and, if necessary, fulfill the User's claims arising from the Contract.	Pursuant to Article 6 (1) (f) of the Regulation, the Data Controller has a legitimate interest in the processing of data.
Billing address: (Postcode, city, street, house number)	It is necessary to enforce legal claims arising after the termination of the Contract or to investigate and, if necessary, fulfill the User's claims arising from the Contract.	Pursuant to Article 6 (1) (f) of the Regulation, the Data Controller has a legitimate interest in the processing of data.

Duration of data management, data erasure deadline: the contract to invoke claims resulting from the end of the time allowed for (for 5 years) Major zi at the data in the Data Manager . If any contact person or legal entity he / she represents objects to the data processing , he / she shall retain it for a further 5 years after termination of the contract in order to assert his / her legitimate interests or fulfill his / her legal obligation.

4.4. Customer correspondence, contacts

Personal data	Purpose of data management
Name	If you have a question about the Website or the Service, you may contact the Data Controller through the contact details contained in this Notice and on the interface of the Website. It serves the purpose of communication between the Data Controller and the User in connection with the issue raised.
E-mail address	If the User has any questions regarding the Website or the Products, he / she may contact the Data Controller through the contact details provided in this Prospectus and on the interface of the Website. It serves the purpose of communication between the Data Controller and the User in connection with the issue raised.
phone number	If the User has any questions regarding the Website or the Products , he may contact the Data Controller through the contact details contained in this Information and on the interface of the Website. It serves the purpose of communication between the Data Controller and the User in connection with the issue raised.

Duration of Data Management: The Data Manager manages the incoming e-mails, postal letters together with the sender's name, e-mail address and other personal data provided in the message until the User's question or comment has been resolved. .

Legal basis for data management : The legal basis for data management pursuant to Article 6 (1) (a) of the Regulation is the voluntary consent of the User.

Data Source: Added directly from the User.

Possible Consequences of Failure to Provide Data: Failure to Communicate Through Customer Correspondence.

4.5. Other data management

4.5.1. Manage cookies

4.5.1.1. Cookies used on the website

Personal data	Scope of managed data	Purpose of data management	Time for data management
Temporary (session) cookies	Name, address, email address, phone number	They are necessary for the more efficient and secure operation of the Website, for the proper functioning of certain functions of the Website or for certain applications.	They are stored for a longer time in the browser cookie file. The duration depends on what setting the User has in his / her web browser.
Persistent cookie	Name, address, email address, phone number.	For a better user experience (eg providing optimized navigation).	They are stored for a longer time in the browser cookie file. The duration depends on what setting the User has in his / her web browser.
Security cookies	Name, address, email address, phone number.	Identify your current user session, prevent unauthorized access.	They are stored for a longer time in the browser cookie file. The duration depends on what setting

			the User has in his / her web browser.
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Legal basis for data management : The legal basis for data management pursuant to Article 6 (1) (a) of the Regulation is the voluntary consent of the User.

Data Source: Added directly from the User.

Possible consequences of non-provision of data: Incomplete availability of the services of the Website, inaccuracy of analytical measurements.

All browsers allow you to change your cookie settings. Most browsers automatically accept cookies by default, but these settings can usually be changed so that the browser can prevent automatic acceptance and offer you the choice to enable cookies each time.

Because the purpose of cookies is to facilitate or enable the use and processes of the Website, blocking or deleting the use of cookies may prevent you from using the Website's full functionality and may cause the Website to malfunction in your browser.

Clear cookies

The user has the right to delete the cookie from his / her computer or to disable the use of cookies in his / her browser. Usually cookies are managed in the browsers' Tools / Preferences menu under Privacy / History / Custom Preferences, under the name of cookie, cookie or tracking.

If you would like to know more about the use of cookies by your browser, please visit one of the following web pages for your browser:

- Google Chrome (<https://support.google.com/chrome/answer/95647?hl=en>)
- Mozilla Firefox (<https://support.mozilla.org/en/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>)
- Windows Internet Explorer (<https://support.microsoft.com/en-us/help/260971/description-of-cookies>)

The possible consequences of failure to datszolgáltatás: the Web services are not available is complete, the inaccuracy of analytical measurements.

4.5.1.2. Data management by external service providers

The html code of the portal contains links from an external server and pointing to an external server, independent of the Data Controller. The third party server is directly connected to the User's computer. Please note that the providers of these links are able to collect user data due to their direct connection to their server and direct communication with the User's browser.

The interface of the Website may contain information, in particular advertisements, coming from third parties, advertising providers who are not related to the Data Controller. These third parties may also place cookies, web beacons on the User's computer, or collect data using similar technologies in order to send the User an advertising message addressed to them in connection with their services. In such cases, the data management is governed by the data protection rules set forth by these third parties, and the Data Controller assumes no responsibility whatsoever with regard to such data management .

The data controllers listed below can provide detailed information on the management of data by an external service provider.

The third-party service providers may use a small data packet on the User's computer for customized service. SÜtit (cookies) are placed and read again. If the browser returns a previously saved cookie, the service providers managing it will be able to link the current visit of the User to a previous cookie, but solely for their own content .

Legal basis for data management : The legal basis for data management pursuant to Article 6 (1) (a) of the Regulation is the voluntary consent of the User.

Data Source: Added directly from the User.

1) Cookies placed by Google Analytics

You can find a description of each cookie [HERE](#)

Performance cookie. If the User does not want Google Analytics to measure data in the manner and purpose described , install a blocking add-on in your browser.

For more information on data management by Google Analytics, please visit <http://www.google.com/intl/en/policies/> . "How to Shop Google uses data when you use the application page or a partner," the document entitled available at the following link: <http://www.google.com/intl/hu/policies/privacy/partners/>

2) Advertising Related "Cookies"

The purpose of the use of cookies related to advertising is to enable the Data Controller to select the advertisements that are of most interest or interest to its visitors and display them on its Website. You can also use these to measure the performance of your campaigns. These cookies allow third-party vendors, including Google, to display targeted ads to other Users on the Web Site based on a previous user visit to the Site . These cookies collect data eg. which page you visited, where you clicked within the page, and how many pages you opened.

Legal basis for data management : The legal basis for data management pursuant to Article 6 (1) (a) of the Regulation is the voluntary consent of the User.

Data Source: Added directly from the User.

Possible Consequences of Not Providing Data: The Website uses Google Adwords remarketing tracking codes. This is based on the fact that you can later use Data Manager to visit your site with remarketing ads on web pages that are part of the Google Display Network. Remarketing code uses cookies to tag visitors. Disables remarketing ads when disabled.

Any personalized content for the User is served by the server of the external service provider. Your Ad Manager ads may be displayed on third-party websites (Google). These external service providers (Google) use cookies to record that the User has previously visited the Data Controller Website and, based on this, to serve ads on a personalized basis to the User (i.e. remarketing activity).

In order to track users and display personalized recommendations, the following service providers handle "Cookies", subject to the express consent of the visitor by means of a statement on the Website: The Website uses "targeting and advertising cookies" from the following service providers:

- **Google Adwords** Detailed information about this service is available at: <https://www.google.com/intl/hu/policies/privacy>

Users of the Website may disable these cookies by visiting the Google Ads Preferences Manager and following the instructions there. After that, they will not receive personalized offers from Data Controller. If the User does not wish to see Remarketing Ads, you may also disable the use of Google's cookie in your Google Advertising Settings. <https://adssettings.google.com/authenticated>

- **Facebook's** detailed information about the service is available at: <https://www.facebook.com/help/cookies/>

5. DATA ACCESS AND DATA SECURITY MEASURES, DATA TRANSMISSION

5.1. Access to data, transmission of data

Personal data may be accessed by Data Controller employees to perform their duties.

The Data Controller shall only transfer personal data processed by it to other bodies or governmental entities in the manner and for the purposes specified by law.

The Data Controller informs the User that, under the authority of a court, prosecutor, investigating authority, violation authority, administrative authority, National Data Protection and Freedom of Information Authority or other legal entities, to provide information, provide data, transfer or make documents available they can contact the controller.

The controller shall disclose personal data to authorities, provided that the authority has indicated the exact purpose and scope of the data, only to the extent and to the extent strictly necessary for the purpose of the request.

5.2. Data security measures

The Data Controller shall take all reasonable measures necessary to ensure the security of the data and shall ensure an adequate level of protection of the data, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction and accidental destruction or damage. The controller shall ensure the security of the data by appropriate technical and organizational measures.

The computer system of the Website is located on the servers of the Data Controller at 3 in 1 Hosting Ltd. (Szigetszentmiklós, Dévai u. 10 / A, 2310) .

The Data Controller shall select and operate the IT tools used to manage the personal data in the course of the provision of the service in such a way that the managed data:

- accessible to authorized persons (availability);
- **its** authenticity and authentication are guaranteed (authenticity of data management);
- unchangeability can be demonstrated (data integrity);
- **be** protected against unauthorized access (data confidentiality).

The data handler retains it during data management

- confidentiality: it protects the information so that only authorized persons have access to it;
- integrity: protects the accuracy and completeness of the information and the method of processing;
- Availability: Ensures that when an authorized user needs it, he / she can actually access the information and tools that he / she needs.

6. USER RIGHTS

6.1. Information and access to personal data

User may request written information from the Data Controller through the contact details set forth in Section II.

- what personal information you have,
- **on** what legal basis,
- what the purpose of data management is,
- **from** what source,
- how long to handle,
- Data Controller to whom, when, under what legislation, to whom you have given access to or to whom your personal data have been transmitted.

The Controller shall provide the information to the User in a widely used electronic format, unless the User requests it in writing on paper. Verbal information over the phone is not provided by Data Controller.

The Data Controller shall provide the User with a copy of the personal data (personally at the customer service) free of charge for the first time. For additional copies requested by the Controller, the Controller may charge a reasonable fee based on administrative costs. If the Data Controller requests the electronic publication of the copy, it shall provide the information to the Controller by email, in a widely used electronic format.

After the information, the User does not agree with the data handling and the correctness of the processed data . **Reference source not found.** . You may request the rectification, addition, deletion, restriction of the processing of Your Personal Data as set forth in **Clause 1.1. Reference source not found.** . may initiate the procedure set out in point.

6.2. Right to rectify or complete personal data processed

Upon the written request of the User, the Data Controller shall correct the inaccurate personal data provided by the User in writing or in any of the Data Controller's business without undue delay, or shall complete the incomplete data with the content indicated by the User. The Data Controller shall inform all recipients with whom the personal data have been provided of the rectification or supplement, unless it proves impossible or requires a disproportionate effort. The User shall inform the addressees of these recipients upon written request.

6.3. Right to Restrict Data Management

User may request from Data Controller a written request to restrict the management of his or her data if a

- User disputes the accuracy of personal data, in which case the limitation applies to the period of time that allows Data Controller to verify the accuracy of personal data,
- the data processing is unlawful and the User opposes the deletion of the data and instead requests a restriction on their use,
- The Data Controller no longer needs personal data for the purpose of data management, but the User requires it for the purpose of submitting, asserting or defending legal claims,
- The User protests against the data management: in this case the restriction applies for a period of time until it is determined whether the data controller's legitimate reasons take precedence over the legitimate reasons of the User.

Except for storage, User personal data may be processed only with the consent of the User, or for the purpose of submitting, enforcing or defending legal claims, or protecting the rights of any other

natural or legal person, or for important Union or Member State public interest. The Data Controller shall inform the User, upon whose request it has restricted the data management, that the restriction of data management shall be lifted beforehand.

6.4. Right to delete

Upon the User's request, the Data Controller shall delete the Personal Data relating to the User without undue delay if any of the specified reasons exist: i) the personal data are no longer needed for the purpose for which they were collected or otherwise processed by the Data Controller; ii) the User withdraws his / her consent to the data management and there is no other legal basis for data processing; iii) The User objects to the data processing for reasons related to his / her own situation and there is no legitimate reason for the data processing; iv) The user objects to the processing of personal data concerning him / her for direct marketing purposes, including profiling, if related to the direct marketing, v) unlawful processing of personal data by the Data Controller; (vi) personal data were collected in connection with the provision of information society services directly to children.

The User shall not exercise his / her right of deletion / forgetting if data processing is necessary for i) exercising his / her right to freedom of expression and information; (ii) on grounds of public interest in the field of public health; (iii) for archiving in the public interest, for the purposes of scientific and historical research or for statistical purposes, where the exercise of the right of erasure would render such processing impossible or would seriously jeopardize it; or (iv) to assert, assert or defend legal claims.

6.5. Right to portability

If the data management is necessary for the performance of the contract or the data management is based on the User's voluntary consent, the User has the right to request that the data provided by the User to the Data Controller be received in a machine-readable form. If technically feasible, you may request that the data be transferred to another controller. In all cases, the data provided by the User is restricted, the portability of other data is not possible. (e.g. stats, etc.)

The User's personal data contained in his / her Data Management System (eg when signing up for a newsletter):

- it is received in an outlined, widely used, machine-readable format,
- has the right to transfer it to another controller,
- request the transfer of data directly to another data controller - if technically feasible in your Data Management System.

The Data Controller shall only comply with the data portability request on the basis of a written request by email or by post. In order to fulfill the request, it is necessary for the Data Controller to make sure that the entitled User intends to exercise this right. Under this right, the User may request the portability of data that he or she has provided to the Data Controller. The exercise of the right does not automatically entail the deletion of the data from the Data Management Systems and therefore the User will continue to be registered in the Data Management Systems after the exercise of this right, unless he / she also requests the deletion of his / her data.

6.6. Protest against the processing of personal data

The User may object to the processing of his / her personal data by a statement to the Data Controller, if the legal basis of the data processing is

- Article 6 of the GDPR. In the public interest referred to in paragraph 1 (e), or
- a legitimate interest within the meaning of Article 6 (1) (f) of the GDPR.

In case of exercise of the right of objection, the Data Controller may not further process the personal data unless it proves that the processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the User or related to the filing, enforcement or protection of legal claims. The Data Controller shall make a determination that the data processing is justified by compelling legitimate reasons. It shall inform the User of its position in this respect.

The User may also object in writing (by email or by mail) or, in the case of a newsletter, by clicking on the unsubscribe link in the newsletter.

6.7. Enforcement of the rights of the deceased Affected User by others

Within five years of the death of the User concerned, the deceased's life rights, such as the right of access, rectification, deletion, limitation of data management, data portability, and right of protest, shall be by a person authorized to do so. If the deceased made more than one such statement, the person named in the statement made at a later date may assert these rights.

If the deceased has not made such a statement, the rights of the deceased person, as defined in the preceding paragraph, may be enforced by the close relative of the deceased within five years of the deceased's death (in the case of several close relatives, is the first to exercise this right).

A close relative of the Ptk. 8: 1st Section 1 (1) states that a spouse, a relative in the direct line, an adopted child, a stepchild and a foster child, an adoptive parent, a stepchild and a foster parent and a sibling. A close relative of the deceased must prove:

- the fact and the time of the deceased's death, by means of the death certificate or court order, and
- certify his identity and, where appropriate, the quality of a close relative by means of an authentic instrument.

In the process of enforcing the rights of a deceased person, in particular in proceedings against the Data Controller, the National Data Protection and Freedom of Information Authority and the courts, the Infotv. and the rights and obligations of the deceased in the life of the deceased.

Unless expressly forbidden in the deceased's statement, the data controller shall inform the close relative of the action taken upon written request.

6.8. Application deadline

Controller without undue delay, shall inform the User, within one month of receipt of any request pursuant to paragraph 1.1, of the action taken. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months, but in this case the Data Controller shall inform the User within one month of receipt of the request and that the User may lodge a complaint. supervisory authority and may have recourse to the courts.

If the User's request is clearly unfounded or excessive (especially considering the repetitive nature), the Data Controller may charge a reasonable fee for the execution of the request or refuse to act on the application. It is up to the Data Controller to prove this.

If the User has submitted the request electronically, the Data Controller shall provide the information electronically, unless otherwise requested by the User.

Unless it proves impossible or requires a disproportionate effort, the Data Controller shall inform all recipients of any rectification, erasure or restriction on the processing of personal data with or to whom the personal data have been communicated. Upon request, the Data Controller informs these recipients.

6.9. Damages and damages

Any person who has suffered material or non-pecuniary damage as a result of a violation of the Regulation shall be entitled to compensation from the Data Controller or the data processor for the damage suffered. The Data Controller shall only be liable for any damage caused by the data processing if he or she has not complied with the statutory obligations specifically imposed on the data processors, or if the Data Controller's lawful instructions have been disregarded or acted against. The Data Controller and the Data Processor shall be released from liability if they prove that they are not liable in any way for the event giving rise to the damage.

7. LEGISLATIVE OPTIONS

You may exercise your rights by email or by written request by post.

You cannot enforce User Rights if the Data Controller proves that you are not in a position to identify the User. If the User's request is clearly unfounded or excessive (especially considering the repetitive nature), the Data Controller may charge a reasonable fee for refusing the request or refuse to take action. It is up to the Data Controller to prove this. If the Data Controller has any doubts about the identity of the natural person who submitted the request, he / she may request additional information necessary to confirm the identity of the applicant.

User pursuant to Info.tv., the Decree and the Civil Code (Act V of 2013)

- a. You can contact the National Data Protection and Freedom of Information Authority (1125 Budapest, Szilágyi Erzsébet fasor 22 / c; www.naih.hu) or
- b. You can assert your rights in court. The lawsuit may, at the User's choice, be instituted before the court of your domicile (for a list and contact details of these courts, see the link below: <http://birosag.hu/torvenyszekek>).

8. MANAGING PRIVACY INCIDENTS

A privacy incident is a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal data that is transmitted, stored or otherwise handled. The Data Controller shall keep records for the purpose of monitoring the measures related to the data protection incident, informing the supervisory authority and informing the User, which contains the scope of personal data affected by the incident, the scope and number of the affected persons, date, circumstances, effects and measures taken. Unless there is a risk to the rights and freedoms of natural persons, the Controller shall inform the User and the Supervisory Authority of the incident without undue delay, but no later than within 72 hours.

9. MISCELLANEOUS PROVISIONS

Data Controller reserves the right to unilaterally modify this Privacy Policy without prior notice to Users using the Website. The changes will take effect on the date specified in the notice, unless the user objects to the changes. User using the website, so-called. by implicit conduct (such as by ticking the checkbox), you agree to the modified Privacy Policy.

If the User has provided third party data in order to use the service for subscribing to the newsletter or for any other purpose, or has caused any damage in the use of the Website, the Data Manager is entitled to claim compensation from the User.

The Controller will not verify the personal data provided to him. The accuracy of the information provided is the sole responsibility of the person providing it. When submitting any User's personal

information, he / she is also responsible for ensuring that the information provided is true, using his / her personal data and using the service exclusively.

Effective Date of this Privacy Policy: 18.08.2019.