

LEAFLET OF INFORMATION ABOUT DATA PROTECTION

TERMS USED IN THE LEAFLET OF INFORMATION

The terms used in the leaflet of information are in conformity with those defined in Infotv (Privacy Act) and GDPR, and their interpretation. The Regulation uses the following terms given in the 4th Article of GDPR:

- **“Personal data”**: any information in connection with identified or identifiable natural persons (“the data subject”); an identifiable natural person is one who can be identified directly or indirectly, especially on the basis of an identifying element, such as number, date defining location, online identifier, or if the natural person can be identified on the basis of one or more factors concerning physical, physiological, genetic, mental economic, cultural or social identities.
- **“Data control”**: any operation or aggregate of operations in any automated or non-automated form to handle personal data or data files, such as collecting, recording, categorising, subdividing, storing, modifying or changing in any form, querying, inspecting, using, communicating, transmitting, distributing or otherwise making it available, co-ordinating or connecting, limiting, deleting or destroying it.
- **“Data controller”**: a 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.
- **“Data processor”**: a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.
- **“Third party”**: a natural or legal person, public authority, agency or any other body which is not identical with the data subject, the data controller or with those persons who are under the direct control of the data controller or the data processor, and who have been authorised for processing personal data.
- **“Consent from the data subject”**: an obvious, voluntary and unambiguous declaration of the will of the data subject, based on proper information, with which he/she expresses with a report or his/her behaviour that he/she gives consent to processing personal data in connection with him/her, making the confirmation obvious.

I – GENERAL PROVISIONS

The aim of this Declaration of Data Control is to define the principles and rules which are applied to using the personal and other data which the operator of the website (IBV Hungária Kft.) may get from those who use the website.

This regulation of data control applies to the storage and handling of data given voluntarily by the visitors of the site ibv.hu, which data are in connection with sending newsletters to them. The Data controller must handle personal data in compliance with the following basic principles:

- Personal data may only be handled for a specific purpose, for the exercise of rights and for meeting the given obligation. At all stages of data control the purpose of data control must be met, furthermore, the entry and management of the data must be fair and legitimate.
- Only personal data that is essential for achieving the purpose of data control, and is suitable for achieving the goal, can be handled. Personal data can only be handled to the extent and for the duration required to achieve the goal.
- Personal data preserves this quality while handling it, as long as its relationship with the data subject can be restored. The relationship with the data subject can be restored if the data controller has the technical conditions that are necessary for restoration.
- During data control it must be ensured that the data are exact and complete, and – if it is necessary regarding the purpose of data control – they are up-to-date. It must also be guaranteed that the data subject may only be identified as long as it is necessary for the purpose of data control.

Name of the data controller: IBV Hungária Kft. (hereinafter: Data Controller)

Address of the data controller: 6100 Kiskunfélegyháza, Csanyi út 71.

Contacts of the data controller: info@ibv.hu

tel.: +36 70 4632-111

website: www.ibv.hu

The legal basis for data control: consent from the data subject, according to the ruling of Act CXII of 2011 on Informational Self-Determination and Freedom of Information, § 5, Paragraph 1, Item a)

Those affected by the issue of data control: Visitors to the website and subscribers to the newsletter

Consent to data control: When subscribing to the newsletter and visiting the website the users expressly authorise the Data Controller to handle their personal data as described in this leaflet of information.

The purpose of data control: sending e-mails of information, and monitoring figures of visits to the website.

The way of data control: automated data processing

1 – SPHERE OF THE CONTROLLED PERSONAL DATA:

When providing user's data voluntarily (they are given voluntarily, nevertheless they are essential for using the services), you may give the following ones for filling in the registration form available on the following sites:

<http://www.ibv.hu/hu/newsletter/subscriptions> and

<http://www.ibv.hu/en/newsletter/subscriptions>

- E-mail address "E-mail" – purpose: sending newsletters

2 – THE BODY OF DATA PROCESSORS (THOSE PERFORMING THE TECHNICAL TASKS IN CONNECTION WITH ACTIVITIES OF DATA CONTROL):

It is the staff of the IT Department of IBV Hungária Kft. (6100 Kiskunfélegyháza, Csanyi út 71.) who perform the technical tasks in connection with activities of data control. The company does not use the services of any third party for this purpose.

3 – DURATION OF DATA CONTROL:

The Data controller may handle the given data for an indefinite period of time or until the data subject withdraws his/her consent.

4 – FORWARDING DATA ABROAD:

No data are forwarded.

5 – RIGHTS OF THE DATA SUBJECTS:

The data subject may ask the Data Controller

- to give information regarding the control of his/her personal data
- to correct his/her personal data, and
- to delete or block his/her personal data – with the exception of those necessary for compulsory data control.

For the request of the data subject the Data controller gives information regarding his/her data which the Data controller manages, or which the Data processor commissioned by Him processes, their sources, the purpose of data control, its legal basis, duration, the name and address of the Data processor and its activities in connection with data control, the conditions of an eventual incident of data protection, its effects and the measures made to overcome it, furthermore – if personal data of the data subject have been forwarded – about the legal basis of forwarding such data and the recipient.

The Data Controller – if He has an internal data protection officer, through the Internal Data Protection Officer – keeps records in order to check the measures taken in connection with the incident of data protection, and to be able to inform the data subject. Such records must contain the sphere of the personal data concerned, the sphere of those affected by the incident of data protection and their number, the date and time of the incident of data protection, its conditions and effects, the measures taken to overcome it, and the other data defined in the provision of law which makes data control necessary.

The Data controller is obliged to give the required information to the data subject in the shortest possible time, but in not more than 25 days after handing in the request, in an easily understandable form.

The information is free of charge if the party asking for it has not submitted such a request to the Data controller in the given year, regarding the same field of data. In other cases the Data controller may set charges.

The Data controller must delete personal data if

- their control is against the law;
- the data subjects ask it;
- the data are incomplete or incorrect – and this situation cannot be remedied legally –, provided that the deletion is not prevented by the law;
- the goal of data control does not exist anymore, or the deadline for keeping the data – defined in the applicable provision of law – is over;
- it is required by a court or the Authorities.

The data subjects and, all those who have already received the data for the purpose of data control, must be notified about any correction, blocking marking and deletion of the data concerned. The notification may be omitted if it is necessary for the purpose of the aim of the data control, and does not infringe the interests of the given persons.

If the Data controller does not meet the request of the data subject to correct, lock or delete some data, He must give the factual and legal reasons for rejecting it, within 30 days after getting the request. He must give the information in writing or in an electronic format if the data subject gives consent to it. If the request for correction, deletion or locking is rejected, the Data controller must inform the data subject about the available legal remedies, and the possibilities to contact the authorities.

6 – OBJECTION TO HANDLING PERSONAL DATA:

The data subjects may object to handling their personal data

- if handling or forwarding personal data is only necessary to meet the legal obligations of the Data controller, or in order to enforce rightful legal interests of the Data controller, the recipient of the data or a third party, except if data handling is obligatory;
- if the use or forwarding of the personal data is done in order to gain business opportunities, to conduct public opinion polls or scientific researches; and
- in other cases defined by the law.

The Data controller shall examine the objection within the shortest time, but within maximum 15 days after submitting the request, decide whether the request is justified, and inform the party submitting the objection about the decision in writing.

If the Data controller establishes that the objection of the given party is justified, He must stop handling the data – including further their collection and forwarding –, and block them. Furthermore, He must also notify the parties – to whom the personal data concerned have been forwarded – about the objection and the measures having been taken on account of the objection, and they are obliged to make arrangements in order to enforce the right of objection.

If the data subject does not agree with the decision of the Data controller, or if the Data controller does not meet the above deadline, the data subject may go to law within 30 days after the decision is declared or after the last day of the deadline.

If the data subject objects to using his/her personal data or has taken the case to court, and if a third party submits a request to publish data without the consent of the data subject concerned, the data may be submitted to the legal representatives commissioned by the data controller, so that these legal representatives decide whether the above is legally justified or not.

7 – LEGAL REMEDY

We remind you that if you feel that the Data controller has violated your privacy rights, you may contact us, and we try to remedy the possible violation of rights.

We are also informing you that the data subjects may go to law and file a suit against the Data controller at a court if their rights are violated. In such a case the court proceeds at the shortest possible time. The trial is in the jurisdiction of a court. The data subject may decide whether to start the lawsuit at a court at the seat of the Data controller, or at a court of the town where he/she is living or staying. Entities without any legal qualification may also be parties in the lawsuit.

If the Data controller causes any damage to others by handling the data of the data subjects illegally, or by violating the rights of privacy, He is obliged to reimburse it. If by handling the data of the data subjects illegally, or by violating the rights of privacy the Data controller violates the personality rights of the Data subjects, they may demand compensation for the damage. The Data Controller is exempt from liability for damages and does not have to pay compensation if He can prove that the violation of the personality rights of the data subject has been caused by conditions of force majeure outside of the area of data handling. No compensation has to be paid and it may not be demanded if the damage is caused by the deliberate or gross negligence of the data subject.

8 – PROCESS OF THE AUTHORITIES

The data subjects may contact the Authorities and may ask information from them, as well:

Name: Nemzeti Adatvédelmi és Információs Hatóság (National Authority for Data Protection and Freedom of Information)

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

Mailing address: 1530 Budapest, Pf.: 5.

Telephone: +36 1 391-1400

Fax: +36 1 391-1410

Homepage: <http://naih.hu>

Registration number of data handling: NAIH-126761/2017

II – DETAILED PROVISIONS OF DATA CONTROL

1 – USING COOKIES:

When you read the www.ibv.hu site, it may involve our using cookies or similar technologies to identify your browser or device. A cookie is a small file that gets to your computer when you search for a site. When you visit this site again, your cookie will make it possible for the site to recognize your browser. Cookies may store settings of users and other items of information. On other platforms – where cookies are unavailable or cannot be used – other technologies, similar to cookies, are used. Their purpose is similar to those of cookies. Such a technology, for example, is the one which identifies advertisements on Android mobile devices. You can reset your browser that it should reject all the cookies, or indicate if the system is actually sending a cookie, but in such a case it may be possible that some functions or services of a website will not work properly without cookies.

On the www.ibv.hu site there are cookies used by Google Analytics, and their application is according to the privacy guidelines of Google

(<https://support.google.com/analytics/answer/6004245?hl=hu>) .

2 – USING E-MAIL ADDRESSES FOR MARKETING PURPOSES:

The data controller only sends letters with advertisements to the e-mail address given at the registration if the given party has also got registered for receiving newsletters. Such a registration may be withdrawn any time, and without any limitation at the following sites:

<http://www.ibv.hu/hu/newsletter/subscriptions> and

<http://www.ibv.hu/en/newsletter/subscriptions>.

Apart from this, the Data controller also provides a possibility to unsubscribe by e-mail, and those registered may ask for deleting their data at the info@ibv.hu e-mail address.

3 – DATES OF THE THIRD PARTY IN CHARGE OF WEBSITE MAINTENANCE:

- Name: Internetmenedzser Kft.
- Address: 1061 Budapest, Jókai tér 7.
- Mobile phone no.: +36 20 237 1605
- Website: www.proweboldal.hu