



ETHHCK HUNGARY LTD.  
BUDAPEST

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## PRIVACY POLICY

**Organization name:**ETHHCK Hungary Limited Liability Company

Headquarters: 1132 Budapest, Visegrádi utca 42-46.

**Tax number:**27272631-2-41

**Company registration number:**01 09 351334

**Name of person authorized to represent:**Gyulán Böröcz

These regulations are constantly reviewed and maintained depending on changes in legislation.

**Effective:** January 08, 2021

## PRIVACY POLICY

of the  
[www.ethhck.hu](http://www.ethhck.hu)  
[www.ethhck.hu/landing/](http://www.ethhck.hu/landing/)

websites, as well as personal data provided during the use of the services indicated there on data management by ETHHCK Hungary Kft

ETHHCK Hungary Kft., as the controller of personal data (hereinafter: "Data controller"), informs the Users with this statement about its data management practices, the measures it has taken to protect the personal data in its possession, and the Users' legal remedies.

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 on the repeal of Regulation 95/46/EC (General Data Protection Regulation) (April 2016) 27.), we provide the following information.

The purpose of the Data Management Information is for Users to receive adequate information about their individual rights and obligations related to the management of their personal data. On the basis of this information, the circumstances of the management of their personal data become known to the Users, on the basis of which they can make a well-founded decision to give their consent to the data management.

Data management is governed by Article 6 (1) point a) of the GDPR and Infotv. According to Section 20 (2), this is done on the basis of a voluntary, prior, properly informed declaration by the Users, which declaration contains the express consent of the Users to the use of the Personal Data provided by them during the use of the site, or the Personal Data generated from them. In the case of data management based on consent, the User has the right to withdraw his consent at any time, which, however, does not affect the legality of the data management before the withdrawal.

Personal data can only be processed for specific purposes, in order to exercise rights and fulfill obligations. In all stages of data management, the purpose of data management must be met, the collection and management of data must be fair and legal. Only personal data that is essential for the realization of the purpose of data management and suitable for achieving the purpose can be processed. Personal data can only be processed to the extent and for the time necessary to achieve the purpose.



## Privacy Policy

### 1. IDENTIFICATION OF THE DATA CONTROLLER

<b>Data controller</b>	ETHHCK Hungary Kft.
<b>Headquarters</b>	1132 Budapest, Visegrádi Street 42-46.
<b>Tax number</b>	27272631-2-41
<b>Company registration number</b>	01 09 351334
<b>Representative name</b>	Gyulán Böröcz

#### Contact details:

<b>Websites</b>	<a href="http://www.ethhck.hu">www.ethhck.hu</a> , <a href="http://www.ethhck.hu/landing/">www.ethhck.hu/landing/</a>
<b>E-mail</b>	ethhck@ethhck.hu
<b>Phone number</b>	+36 30 279 1887
<b>Mailing address</b>	1135 Budapest, Visegrádi Street 42-46.

The data management information is available:

<https://www.ethhck.hu/adatkezelesi-tajekozato>

## **2. THE TERMS FOUND IN THIS INFORMATION SHOULD BE INTERPRETED AS FOLLOWS:**

1. **Personal data:** any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;
2. **Data handling:** any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, organization, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or making available in any other way through, alignment or connection, restriction, deletion or destruction;
3. **Limitation of data management:** indication of stored personal data for the purpose of restricting their future processing;
4. **Profiling:** any form of automated processing of personal data, during which personal data is used to evaluate certain personal characteristics of a natural person, in particular work performance, economic situation, state of health, personal preferences, interests, reliability, behavior, residence
5. **Pseudonymization:** the processing of personal data in such a way that, without the use of additional information, it is no longer possible to establish which specific natural person the personal data refers to, provided that such additional information is stored separately and technical and organizational measures are taken to ensure that identified or this personal data cannot be linked to identifiable natural persons; 6. "registry system": the file of personal data in any way - centralized, decentralized or divided according to functional or geographical aspects - which is accessible based on specific criteria;
7. **Data manager:** the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or together with others; if the purposes and means of data management are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be determined by EU or member state law;
8. **Data processor:** the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller;
9. **Addressee:** the natural or legal person, public authority, agency or any other body to whom the personal data is communicated, regardless of whether it is a third party. Public authorities that have access to personal data in accordance with EU or Member State law in the context of an individual investigation are not considered recipients; the management of said data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of data management;
10. **Third party:** the natural or legal person, public authority, agency or any other body that is not the same as the data subject, the data manager, the data processor or the persons who have been authorized to handle personal data under the direct control of the data manager or data processor;
11. **Consent of the data subject:** the voluntary, specific, and clear declaration of the will of the data subject based on adequate information, by which the data subject indicates through a

statement or an act clearly expressing the confirmation that he gives his consent to the processing of personal data concerning him;

12. **Data protection incident:**a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored or otherwise handled;
13. **Authorities:**the National Data Protection and Freedom of Information Authority (NAIH)
14. **Undertaking:**a natural or legal person engaged in economic activity, regardless of its legal form, including partnerships and associations engaged in regular economic activity.
15. **Interested:**the person who is interested in the available services by providing their personal data to the Data Controller through the website, and whose personal data is collected and managed by the Data Controller.
16. **Applicant:**the person who, by filling out the application form provided on the website or when applying in person, indicates his intention to participate in a program offered by the Data Controller, or participates in a program, and whose personal data is collected and managed by the Data Controller.
17. **User:**Interested Party and Applicant together, whose personal data is collected and managed by the Data Controller.

### **3. PURPOSE OF DATA MANAGEMENT:**

#### **3.1. The purpose of managing the user's personal data is to**

- when using the services of the website, the Data Controller must have the Data Subject's data, which enables the Data Controller to make direct contact with users, as well as direct and efficient administration of the above;
- the Data Controller shall send the Data Subject information leaflets and offers on current affairs, contact the Visitor directly in the form of a newsletter in order to recommend its services,
- in the course of performing its activities, the Contractor manages personal data in order to be able to serve the needs of the Users using its services at an outstanding professional level and to comply with its legal obligations

#### **3.2. Furthermore, the purpose of processing the interested party's personal data**

- informing the Interested Party about the services provided by the Data Controller, their detailed description and presentation in accordance with the client's needs;
- appointment booking for the smooth service of those concerned;
- answering the questions asked by the Interested Party;

#### **3.3. The purpose of managing customers' personal data is also to**

- Based on the Data Controller's application, the Contractor can provide services related to serving Customers
- be able to provide various discounts and services in accordance with the needs of the clientele in order to serve the interested parties at the highest possible level.

**4. SCOPE OF MANAGED DATA:**

As a general rule, ETHHCK Hungary Kft. can only involve those named in point 14 of this Data Management Information as data processors during its data management activities.

The processed data will not be forwarded to third parties. If a different rule is applied, it will be indicated separately for the given data management.

Please note that the release of personal data to courts and authorities may be required by law. If a court or authority obliges the Data Controller to hand over personal data in the course of a legally established procedure, it is obliged to fulfill its legal obligation and provide the requested data to the proceeding court or authority. In relation to all data processing, the relevant rights of enforcement and legal remedy detailed in point 10 belong to the data processing data subject.

It manages the following personal data about its customers for the following listed data management purposes:

**4.1 Website visit**

Anyone can access the Contractor's/Agent's website without revealing their identity or providing their personal data, and can obtain information freely and without restrictions on the website and related pages.

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However, the website collects unlimited and automatic information about visitors.

Certain parts of this website are called uses "cookies". Regarding the use of cookies, the Data Controller acts as described in point 11.

Data category	purpose of Data Management	the source of the Data
IP address	customer ID	from the person concerned
the date of the visit	to measure attendance, statistical purposes	
data of visited subpages	to measure attendance, statistical purposes	
the type of operating system and browser you are using	to measure attendance, statistical purposes	

**Legal basis for data management**the legitimate interest of the business (GDPR Article 6 (1) point (f)).

**4.2 Contact** -interest in the service on the website, in person, by phone or e-mail

ETHHCK Hungary Kft. can be contacted in person, by phone, in writing and by e-mail.

If the data subject makes contact verbally (in person, by phone) and the matter in which the data subject contacted the Data Controller cannot be resolved immediately, the Contractor may make a note of what the data subject said.



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If the data subject contacts the Company in writing, the written inquiries (by post or in the case of personal handover by the data subject, on paper) will be filed by the Data Controller, and then substantive administration of the matter will begin.

If the person concerned contacts the Contractor by e-mail, the Contractor will begin the substantive handling of the matter as soon as possible.

If the person concerned makes contact via these channels, he consents to the data management by voluntarily contacting ETHHCK Hungary Kft.

**The purpose of data management:**ensuring contact with the Enterprise, managing the submitted case.

**Legal basis for data management:**consent of the data subject in accordance with Article 6 (1) a) of the GDPR.

**Data storage deadline:**until the given contact is arranged.

**Scope of processed personal data:**

Data category	Purpose of data management	Source of data
name	data essential for the identification of the customer	comes from the person concerned
e-mail address, phone number, address	data essential for the identification of the customer	
contact, subject of interest, message content	data essential for the identification of the customer	

**Possible consequences of failure to provide data:**The Contractor is unable to provide a meaningful response to the request of the person concerned.

**Duration of data management:**until the contact is completed or the consent is revoked.

### 4.3 Data management related to registration and appointment booking

The Contractor provides the opportunity for its customers to book an appointment to use its services electronically. Check-ins are handled individually, and our customers receive their appointments individually, taking into account the 7 available capacities.

**The purpose of data management:**booking an appointment for the use of services, based on the individual login of the person concerned.

**Legal basis for data management:**prior consent of the person concerned, GDPR Article 6 (1) point a).

**Scope of processed personal data:**

Data category	Purpose of data management	Source of data
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name	identification	from the person concerned
e-mail address, phone number, address	data absolutely necessary to establish contact with the customer	
appointment booking data (date, time, number of staff)	to specify the customer's interests, correspondingly, personalized data necessary to answer, based on the customer's own communication	
optionally specified other question, message	the customer can optionally provide any additional information that helps to personalize the offer	

**Possible consequences of failure to provide data:** The Company cannot give the interested party a specific time to use its services.

**Duration of data management:** until the offer obligation expires or the consent is withdrawn.

The Data Controller provides the customer with a personalized offer, as required by Act V of 2013 6:64 of the Civil Code. You can use it until the offer is binding according to §. If the contracting authority does not accept the offer within this period, the Data Controller will delete its data, because the contract cannot be concluded based on this. If the contracting authority accepts the offer, the Contractor/Appointee will continue to manage its data during the data management related to the use of the service - it will be informed about this when the legal relationship is established.

### **5. LEGAL BASIS FOR DATA MANAGEMENT:**

5.1. The processing of personal data is governed by Article 6 (1) point a) of the GDPR and Infotv. Based on Section 20 (2), in all cases it is based on the consent of the data subject. Before using the website's services, the Data Controller informs the data subjects about the fact of data management and what data is necessary for the data subject's interests. The data subject gives his consent to data management before sending his personal data.

Before giving consent to data management, the User is obliged to read and familiarize himself with the Data Management Information.

The User may at any time request the termination of data processing and the Data Manager to delete or block his personal data.

5.2. The User can give his consent to the management of personal data by ticking the corresponding checkbox on the website. In the event of a personal inquiry, after filling out the Consent Statement, you confirm by signing it that you have read the information contained in the Data Management Information and consent to data management in accordance with its provisions.

5.3. Browsers visiting the website are only affected by the data management resulting from the operation of the "cookies" used by the website, to which they consent by accepting the information that pops up when they start browsing the website or by continuing to browse.

5.4. By voluntarily providing the Data Controller with his/her name, e-mail address and telephone number, the interested party consents to the processing of the data indicated by him/her by checking the checkbox.

### **6. PERSONS AUTHORIZED TO USE THE DATA, DATA TRANSMISSION:**

6.1. The Data Controller uses the services of the Data Processors indicated in point 14 for the management and processing of personal data.

The Data Controller forwards the personal data necessary for User identification to the Data Processors for participation in programs organized by the Data Controller, as well as for the successful completion of related administrative tasks, as well as for marketing purposes related to the programs, including sending newsletters for marketing purposes in particular.

For data transmission to the Data Processors included in point 14, the User gives his consent at the same time as consent to data management.

The purpose of the data transmission is the successful completion of the services provided by the Data Controller and related administrative tasks, as well as the implementation of related marketing activities, during which the following personal data may be transmitted: - name, e-mail address, telephone number.

In case of the User's request for information, the Data Controller provides precise information about which of the User's personal data, to whom, and how the User can contact the given partner.

6.2. 6.1. in addition to the provisions of point 2, the Data Controller only transmits data to authorities in the event of a legal obligation.

6.3. The Data Controller keeps a data transfer register in order to check the legality of the data transfer and to ensure that the User is informed.

Personal data are treated confidentially by the Data Controller, they are provided to third parties - 6.1 of this Data Management Information. and 6.2. does not release it except as stated in point

Only those employees of the Data Controller who are involved in the operation of the website, as well as in the performance of additional tasks arising in connection with the services available through the website, and in handling possible objections and warranty claims, are entitled to access personal data managed by the Data Controller. Employees of the Data Controller entitled to data management have access only to the personal data of Users that is essential for the activities they perform.

The Data Controller takes all generally expected measures to ensure that personal data cannot be accessed by unauthorized third parties in the course of its IT system and administration, and for this purpose operates a secure and closed IT network.

During the data management, the Data Controller ensures the accuracy, completeness and, if necessary in view of the purpose of the data management, the up-to-dateness of the data.



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### **7. DECLARATION OF REQUEST FOR DATA PROCESSING:**

The Data Controller does not operate an automated data processing system for the data collected and managed through the website, and when applying for the services it provides, it manually records the data provided in the database it maintains. The Data Controller uses separate data processors indicated in point 14.

### **8. PERIOD OF DATA MANAGEMENT:**

8.1. The Data Controller processes the Data Subject's data for an indefinite period of time, but at most until the User requests the termination of data processing and the deletion of his personal data.

8.2. The Data Manager deletes the data of the Interested Parties immediately after answering and dealing with the questions contained in the message, investigating complaints and comments, due to the realization of the given data management purpose.

### **9. RIGHTS OF THE USER IN RELATION TO DATA MANAGEMENT:**

#### **1. Information**

The Data Subject can at any time ask the Data Controller to inform him about the handling of his personal data. The Data Controller is obliged to provide the information in writing at the request of the data subject in a form that is understandable to the public as soon as possible, but no later than 25 days after the submission of the request.

The Data Subject may send his request for information to the Data Controller in writing by post, fax or e-mail. In the application, the User is obliged to indicate his/her identification data, based on which the Data Controller can establish his/her right to access the personal data. In the application, the User is obliged to indicate his electronic or postal contact information to which the Data Controller can provide the information.

The Data Subject may request information about the scope of the personal data processed, the source of the personal data, the purpose of the processing of the personal data, as well as the legal basis on which the Data Controller processes the personal data, as well as how long the personal data is processed by the Data Controller, as well as the About the data controller's activities related to the management of personal data.

Upon request, the Data Controller will provide information to which contractual partner the personal data was forwarded, as well as the legal basis for the data transmission.

Should a data protection incident occur during data management, the Data Subject may also request information on its circumstances, effects and the measures taken by the Data Controller to prevent it. A data protection incident means that personal data is handled or processed in a manner that violates the law. This is especially the case if an unauthorized person has access to the personal data, the personal data is changed, transmitted or disclosed in an illegal manner, or it is deleted or destroyed in an illegal manner. It is also considered a data protection incident if personal data is destroyed or damaged due to an accidental event.

The Data Controller shall provide the information in an e-mail message within a maximum of 25 days from the date of receipt of the Data Subject's request. If the person submitting the request did not indicate their electronic contact information in their request, or specifically requests delivery by post, the Data Controller shall provide the information in writing by post. The Data Controller provides the information for the range of personal data specified in the application free of charge once a year, after which the provision of the information incurs a cost of HUF 1,000 each time.

The Data Controller may refuse to provide information to the data subject only in the following two cases.

- If, in the event of a possible data transfer, the Data Controller receives the personal data from the data transfer party in such a way that the data transfer party informs the Data Controller that the Data Subject's rights to information are limited by some domestic or international law.
- If the Data Subject's right to information is limited by law in the interest of the external and internal security of the state (for example, in the interest of national defense, national security, crime prevention or law enforcement, punishment), as well as in the economic or financial interest of the state or local government, in the significant economic or financial interest of the European Union, and for the purpose of preventing and uncovering disciplinary and ethical offenses related to the practice of occupations, violations of labor

law and labor protection obligations - including in all cases control and supervision - and also for the protection of the rights of the Data Subject or others.

Even in the event of a refusal to provide information in accordance with this point, the Data Controller shall inform the Data Subject in writing of the reason for refusing the information, specifying the legal basis for it. In this case, the Data Controller will also inform the Data Subject of the possibility of legal remedies in court, as well as the possibility of turning to the Authority (in relation to legal remedies, see point 10 of this information sheet below).

### **2. Correction of data**

The Data Subject may at any time ask the Data Controller to correct their personal data if they do not correspond to reality. If the personal data does not correspond to the reality, and the personal data corresponding to the reality is available to the Data Controller, the personal data will be corrected by the Data Controller. The User can send his request for correction to the Data Controller in writing by post or e-mail.

If the Data Controller does not comply with the Data Subject's request for rectification within 30 days of receiving the request, it shall notify the reasons for the rejection in writing or electronically with the User's consent, indicating the legal basis thereof. In this case, the Data Controller also informs the User about the possibility of legal remedies in court and of turning to the Authority.

### **3. Delete or lock data**

The Data Subject may at any time request that the Data Controller delete or block their personal data. The Data Subject may send the request for deletion or blocking in writing to the Data Controller by post or e-mail.

The Data Controller deletes personal data if:

- treated it unlawfully,
- the Data Subject requests the deletion or blocking of his personal data,
- the data management is incomplete or incorrect - and this condition cannot be legally remedied - provided that deletion is not excluded by law,
- the purpose of the data management has ceased or the statutory period for storing the data has expired
- it was ordered by the court or the Authority.

If the Data Controller does not comply with the Data Subject's request for deletion or blocking within 25 days of receipt of the request, it shall communicate the reasons for the rejection in writing or electronically with the Data Subject's consent, indicating the legal basis thereof. In this case, the Data Controller will also inform the Data Subject of the possibility of legal remedies in court and of turning to the Authority.

Instead of deletion, the Data Controller locks the personal data if the Data Subject requests this, or if, based on the available information, it can be assumed that the deletion would harm the legitimate interests of the User. Personal data locked in this way can only be processed as long as the legal or factual circumstances preventing deletion exist.

### **4. Objection to the processing of personal data**

The Data Subject has the right to object to the processing of his personal data in the following cases:

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- if the processing of personal data is necessary only to fulfill the legal obligation of the Data Controller or to assert the legitimate interests of the Data Controller or a third party,
- if the purpose of processing personal data is direct business acquisition, public opinion polls or scientific research,
- if the law allows the User to do so.

The Data Subject can send the objection in writing by post or e-mail to the Data Controller. The Data Controller examines the objection and decides on its validity within a maximum of 15 days from its submission. The Data Controller informs the Data Subject of its decision in writing. If the Data Subject's objection is well-founded, the Data Controller shall terminate the data management and data transfer and block the personal data, as well as notify of the objection and of the measures taken on the basis of it all those to whom the User previously transmitted personal data with the objection, and who are obliged to take action in response to the objection in order to enforce the right.



### **10. LEGAL REMEDY OPTIONS:**

If the Data Subject does not agree with the decisions of the Data Controller specified in point 9, or if the Data Controller misses the 15-day deadline for evaluating the Data Subject's objection, the User - within 30 days from the communication of the decision or the last day of the deadline - can apply to the court for legal redress .

Due to the violation of their rights related to the management of personal data, the Data Subject may apply to the National Data Protection and Freedom of Information Authority for legal redress or file a lawsuit before the competent court.

**A The User can reach the National Data Protection and Freedom of Information Authority at the following contact details:**address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c postal address: 1530 Budapest, Pf.: 5. phone: +36 (1) 391-1400 fax: +36 (1) 391-1410 e-mail:[ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) website:[www.naih.hu](http://www.naih.hu)

You can initiate legal proceedings against the Data Controller before the competent court of your place of residence or residence.

The Data Subject is entitled to consent to data processing by the Data Controller only if he/she has familiarized himself with the data protection and data management provisions set out above, and if he/she is aware of his/her rights and obligations related to the management of his/her personal data.

### **11. INFORMATION REGARDING THE USE OF "COOKIES":**

To help us provide you with a high-quality, smooth and reliable service, we use cookies and similar technologies.

A cookie is a set of data with variable content that the Website server sends to the User's device. The cookie is stored in the browser program of the User's computer, phone or tablet, and the sending server can later read it from there. The cookie cannot be read by any website other than the one that placed it.

Cookies provide information to the Data Controller about visitors' habits regarding the use of the website. The Data Controller intends to use cookies for administrative purposes; thus to measure website traffic and facilitate browsing; by noting previously opened pages within the site.

No cookie contains any personal data that would allow anyone to reach the User by e-mail, telephone or traditional mail. Cookies are not capable of identifying the User by themselves, they are only capable of recognizing the visitor's computer. If the User does not wish to accept the use of cookies on the Website, he can set the web browser he uses in such a way that the program informs him about the placement of cookies with a message, or to prevent the placement of cookies. These settings are usually available in your browser's "settings" or "preferences" menu.

**The purpose of data management:** identification, tracking, and differentiation of users, identification of the current session of users, storage of data provided during that session, prevention of data loss, web analytics measurements, personalized service.

**Legal basis for data management:** consent of the data subject.

**Scope of processed data:** ID number, date, time, and previously visited page. Duration of data management: maximum 90 days

**Additional information about data management:** The user can delete cookies from his computer or disable the use of cookies in his browser. Cookies can usually be managed in the Tools/Settings menu of browsers under the Data protection/History/Personal settings menu under the names cookie, cookie or tracking.

**Possible consequences of failure to provide data:** the impossibility of using the service with regard to the services described in points 4 above.

#### **We distinguish between 3 main types of cookies:**

**Session cookie:** these cookies are limited to one visit and store information so that you do not have to enter certain data again and again while browsing the Site. Session cookies expire and are deleted shortly after leaving the Site or immediately upon closing the browser.

**Persistent cookie:** these cookies store preferences related to your visit and allow us to recognize you when you visit the Site again. They remain in your browser until you delete them or until they expire. Cookies store basic information about your Internet browsing habits, and with their help we can operate the website and customize the user experience as best as possible.

**Social plug-ins:** these are plug-ins operated by social networking sites that enable you to use the services of social networking sites while browsing a website (e.g. like or share functions). These social plug-ins can collect information about the activity on the site, which they can forward to the social site.



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### Cookies used by third parties:

Trusted partners help the Service Provider to display ads on and off the Website, and analytics providers such as Google Analytics, Quantcast, Nielsen, ComScore can also place cookies on the User's device.

Users can block the use of Google cookies on the Google ads opt-out page.

The link <http://www.networkadvertising.org/choices/> also allows you to disable cookies from other third-party providers.

### Use of cookies:

By browsing the website, you accept that we place cookies on your computer in order to be able to analyze how you use our website. The first time you visit our site, we warn you in an information bar that we use cookies, if you do not agree to our use of cookies when you browse this site, our website may not function fully. By continuing to use the Service, you consent to their use.

You have the option to manage or block individual cookies. We will inform you in detail about the ways to do this below.

Browser settings: You can manage cookies with the settings of your internet browser. The exact location of the setting depends on the type of browser. You can quickly find the location of the setting using the "Help" function of your browser. Below you will find more detailed information on how you can make settings in browsers supported by Galéria Savaria:

- Chrome
- Firefox
- Safari
- Microsoft Edge
- Internet Explorer

### How to withdraw consent?

If you have consented to the use of cookies, the browser stores cookies on your computer or other device so that our system can recognize your settings. Consent expires from time to time. However, if you wish to withdraw your consent, you can do so at any time in the cookie settings of your browser.

More information about cookies:

For more detailed information about cookies, visit the following websites:

- More information about cookies in general, as well as the use of cookies and their deletion and blocking
- More information about the cookies used by Google Analytics and their deletion and blocking
- <http://cookiepedia.co.uk/cookie-laws-across-europe>

### **12. SOCIAL MEDIA SITES:**

The fact of data collection, the scope of processed data:

Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. the name registered on social networking sites and the user's public profile picture.

Scope of stakeholders: all stakeholders who have registered on Facebook/Youtube/Instagram, etc. on social networking sites and "liked" the website.

The purpose of the data collection: to promote the sharing or "liking" of certain content elements, products, promotions or the website itself on social networks.

The duration of the data management, the deadline for the deletion of the data, the identity of the possible data controllers entitled to access the data and the description of the rights of the data subjects related to data management: The data subject can find information about the source of the data, its management, the method of transfer and its legal basis on the given social media page. Data management takes place on social networking sites, so the duration and method of data management, as well as the options for deleting and modifying data, are governed by the regulations of the respective social networking site.

The legal basis for data management: the voluntary consent of the concerned person to the processing of his personal data on social networking sites.

### **13. DISCLOSURE OF THE RIGHTS OF THE SUBJECTS RELATED TO DATA MANAGEMENT:**

The data subject may request from the data controller access to personal data relating to him, their correction, deletion or limitation of processing, and he may object to the processing of such personal data, and the data subject has the right to data portability, as well as the right to withdraw consent at any time.

The data subject can initiate access to personal data, its deletion, modification or restriction of processing, portability of data, objection to data processing in the following ways:

- by e-mail: [ethhck@ethhck.hu](mailto:ethhck@ethhck.hu)
- by phone: +36 30 279 1887
- by post: 1135 Budapest, Visegrádi utca 42-46.

The legal basis for data management: the consent of the data subject, GDPR Article 6 (1) point a), that is Infotv. Paragraph (1) of Section 5 and XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. Section 6 (5) of the Act:

The advertiser, the advertising service provider, or the publisher of the advertisement - within the scope specified in the consent - keeps a record of the personal data of the persons who have given their consent. The data recorded in this register - relating to the recipient of the advertisement - can only be handled in accordance with the consent statement, until it is revoked, and can only be transferred to third parties with the prior consent of the person concerned.

We inform you that data management is based on your consent. You are required to provide personal data if you wish to receive a newsletter from us. Failure to provide data will result in us not being able to send you a newsletter.



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### **14. DATA PROCESSING**

Hosting provider

Company name	ETHHCK Hungary Kft.
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Tax number	27272631-2-41
Company registration number	01 09 351334
Homepage	<a href="https://www.ethhck.hu">https://www.ethhck.hu</a>
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Representative	Gyulán Böröcz

**Activity performed by a data processor:**Hosting service

**The fact of the data management, the scope of the managed data:**All personal data provided by the data subject.

**The range of stakeholders:**All stakeholders using the website.

**The purpose of data management:**Making the website available and operating it properly.

**Duration of data management, deadline for data deletion:**By canceling the registration immediately.

**Legal basis for data processing:**consent of the User, GDPR Article 6 (1) a), Infotv. Section 5 (1), Article 6 (1) point a) and CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act 13/A. (3) of §



## Privacy Policy

### **15. DATA SECURITY, COMPANY NAME:**

In order to protect data, the Contractor/Appointee introduced and implemented the following information security measures:

We have a detailed data security policy to ensure the security of the data and information we manage, which is mandatory for all our employees and which all our employees know and apply.

We regularly educate and train our employees regarding the requirements of data and information security.

#### **Data security from an IT point of view**

The Company stores its websites on a server rented from a Hungarian hosting provider, and stores the personal data on the hard drives of the computers at its headquarters, to which only the Contractor can access based on authorization management rules. We test and check our IT systems from time to time, repeatedly and regularly, in order to create and maintain data and IT security.

The office computer(s) are protected by a password, the use of foreign data carriers is limited and only permitted under safe conditions and after verification.

Regular and continuous protection against malicious software covering all systems and system components of the Contractor is ensured.

During the planning and operation of programs, applications and devices, security functions are handled separately and prioritized.

#### **Data security in communication**

In order to fulfill the requirement of secure data exchange with regard to messages and files transmitted electronically, we ensure the integrity of the data for both (communication) control and user data. The protection we use detects the occurrence of unauthorized modification, jamming, and retransmission. In the case of the network used for data transmission, we ensure the prevention of illegal connection and eavesdropping in accordance with the security level.

#### **SSL certificate**

The SSL certificate guarantees trouble-free data transfer between the server and the browser and is reliable for 99.9% of browsers.

The SSL certificate protects the flow of information between the server and the browser. It protects personal data, access codes and more to protect you from hackers and all other online fraudsters.



## Privacy Policy

### **16. FINAL PROVISIONS:**

If the scope of the managed data and the other circumstances of the data management change, this data management information will be amended in accordance with the provisions of the GDPR within 30 days and published on the [www.ethhck.hu](http://www.ethhck.hu), [www.ethhck.hu/landing/](http://www.ethhck.hu/landing/) on websites. Please read the amendments to the data management information carefully in all cases, because they contain important information about the management of your personal data.