



Z6 Sport Innovation Ltd (projectbestrong.com)

Projectbestrong.com Privacy Policy

Z6 Sport Innovation Ltd.

Privacy notice

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Introduction

A/Az Z6 Sport Innováció Kft. (4027 Debrecen, Fűredi út 49-51., tax number: 23169238-2-09, company registration number/registration number: 09-09-020607) (a

hereinafter referred to as the "Service Provider" or the "Controller") is subject to the following rules and regulations REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation).

the following information is provided.

This Privacy Policy governs the processing of data on the following sites/mobile applications: <https://www.projectbestrong.com>

From data management information available at at
at <https://projectbestrong.com/adatvedelem>

Amendments to the Rules will enter into force upon publication at the above address.

Data controller and contact details

Name: Z6 Sport Innovation Ltd.

Head office: 4027 Debrecen, Füredi út 49-

51. E-mail: project@bestrong.com

Phone: +36 70 935 7144

Definitions of terms

1. "*personal data*" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. '*processing*' means any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. '*controller*' means 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; where the purposes and means of the processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law;
4. "*processor*" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
5. "*recipient*" means a natural or legal person, public authority, agency or any other body to whom or with which personal data is disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;
6. "*the data subject's consent*" means a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;
7. "*data breach*" means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
8. "profiling" means any form of automated processing of personal data by which personal data are processed in relation to a

to assess certain personal characteristics of a natural person, in particular job performance, economic situation, health, used to analyse or predict characteristics related to personal preferences, interests, reliability, behaviour, location or movement.

Principles governing the processing of personal data

Personal data:

1. must be lawful, fair and transparent for the data subject ("*lawfulness, fairness and transparency*");
2. collected only for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes shall not be considered incompatible with the original purpose in accordance with Article 89(1) ("*purpose limitation*");
3. be adequate and relevant for the purposes for which the data are processed and limited to what is necessary ("*data minimisation*");
4. be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay ("*accuracy*");
5. be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1), subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of data subjects as provided for in this Regulation ("*limited storage*");
6. be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("*integrity and confidentiality*"), by implementing appropriate technical or organisational measures.

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("*accountability*").

The controller declares that its processing will be carried out in accordance with the principles set out in this point.

Data processing related to the operation of the webshop / use of the service

1. The fact of collection, the scope of the data processed and the **purpose of the processing**:

Personal data	Purpose of data processing	Legal basis
User name	Identification, enabling registration.	Article 6(1)(a) of the GDPR.
Password	It is used for secure access to the user account.	
Surname and first name	A to contact you, to make a purchase, to issue a proper invoice, to exercise the right of withdrawal.	Article 6(1)(b) of the GDPR.
E-mail address	Staying in touch.	
Phone number	Maintaining contacts, coordinating more efficiently on billing or delivery issues.	
Billing name and address	To issue proper invoices, and to create, define, amend, monitor the performance of, invoice the fees arising from, and enforce the claims related to the contract.	Article 6(1)(c) The legal obligation is Section 169 (2) of Act C of 2000 on Accounting)

Delivery name and address	Enabling home delivery.	Article 6(1)(b) of the GDPR.
Date of purchase/registration	Perform a technical operation.	Section 13/A (3) of the Elker Act.
A purchase/registration age IP address	Perform a technical operation.	

2. Data subjects: all data subjects registered/customers of the webshop website. Neither the username nor the e-mail address need to contain personal data.

3. Duration of processing, time limit for erasure of data: if one of the conditions of Article 17(1) of the GDPR is met, until the data subject's request for erasure. The controller shall inform the data subject of the erasure of any personal data provided by the data subject by electronic means pursuant to Article 19 of the GDPR. If the data subject's request for erasure also includes the e-mail address provided by him or her, the controller shall erase the e-mail address following the notification. Except in the case of accounting records, since pursuant to Article 169 (2) of Act C of 2000 on Accounting, these data must be kept for 8 years. The contractual data of the data subject may be deleted after the expiry of the civil law limitation period on the basis of a request for deletion by the data subject.

The accounting documents (including general ledger accounts, analytical or detailed records) directly and indirectly supporting the accounting accounts must be kept for at least 8 years in a legible form, retrievable by reference to the accounting records.

4. **Potential data controllers entitled to access the data, recipients of personal data:** personal data may be processed by the controller and by its authorised staff, in compliance with the above principles.

5. **Description of data subjects' rights in relation to data processing:**

- The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and
- the data subject has the right to data portability and the right to withdraw consent at any time.

6. **The data subject may request access to, deletion, modification or restriction of processing of personal data, or the portability of data in the following ways:**

- by post to 4027 Debrecen, Füredi út 49-51,
- by e-mail at project@bestrong.com, by phone at +36 70 935 7144.

7. **Legal basis for processing:**

1. Article 6(1)(b) of the GDPR,
2. Paragraph 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (hereinafter: Elker Act):

The service provider may process personal data that are technically necessary for the provision of the service. The provider must, other conditions being equal, choose and in any case operate the means used in the provision of the information society service in such a way that personal data are processed only to the extent strictly necessary for the provision of the service and for the fulfilment of the other purposes laid down in this Act, but only to the extent and for the duration necessary.

3. Article 6(1)(c) in the case of invoices issued in accordance with accounting legislation.

4. In the event of enforcement of claims arising from the contract, the period of limitation is 5 years pursuant to § 6:22 of Act V of 2013 on the Civil Code.

§ 6:22 [Limitation period]

(1) Unless otherwise provided by this Act, claims shall be barred after five years.

(2) The limitation period starts to run when the claim becomes due.

(3) The agreement to change the limitation period must be in writing.

(4) The agreement excluding the limitation period is null and void.

8. **Please note that**

- **the processing is necessary for the performance of a contract and the submission of an offer.**
- you **must** provide personal information so that we can fulfil your order.
- failure to provide the data will **result in** our inability to process your order.

Cookie management (cookies)

1. The so-called "password-protected session cookie", "Shopping cart cookies", "Security cookies", "Necessary cookies", "Functional cookies", and "Responsible for managing website statistics cookies" does not require the prior consent of the data subject.
2. Fact of processing, scope of data processed: unique identifier, dates, times.
3. Data subjects: all data subjects visiting the website.
4. Purpose of data processing: to identify users, track visitors, ensure tailored operation.
5. Duration of processing, deadline for deletion of data:

Type of cake	Legal basis for processing	Duration of data processing
Session cookies or other cookies that are essential for the functioning of the website	No data is processed by using the cookie.	It remains on the computer until the end of the relevant visitor session, i.e. until the browser is closed.
Statistical, marketing cookies	Article 6(1) of the GDPR point a)	1 day - 2 years, in accordance with the cookie prospectus, or until the data subject's consent is withdrawn.

6. Potential data controllers who may have access to the data: personal data may be accessed by the controller.
7. Description of data subjects' rights in relation to data processing: data subjects have the possibility to delete cookies in the Tools/Preferences menu of their browsers, usually under the Privacy settings.
8. Most browsers used by our users allow you to set which cookies should be saved and allow (certain) cookies to be deleted again. If you restrict the saving of cookies on specific websites or do not allow third party cookies, this may in certain circumstances lead to our website no longer being fully usable. Here you will find information on how to customise your cookie settings for standard browsers:

Google Chrome (<https://support.google.com/chrome/answer/95647?hl=hu>)

Internet Explorer

(<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete->

[manage-cookies\)](#)

Firefox

<https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>

Safari (<https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>)

Using Google Ads conversion tracking

1. The data controller uses the online advertising program "Google Ads" and makes use of Google's conversion tracking service within its framework. Google Conversion Tracking is an analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").
2. When you visit a website through a Google ad, a cookie is placed on your computer for conversion tracking. These cookies have a limited validity and do not contain any personal data, so the User cannot be identified by them.
3. When the User browses certain pages of the website and the cookie has not expired, Google and the data controller may see that the User has clicked on the advertisement.
4. Each Google Ads client receives a different cookie, so they cannot be tracked through Ads clients' websites.
5. The information, which is obtained through the use of conversion tracking cookies, is used to provide conversion statistics to Ads customers who opt for conversion tracking. Customers are then informed of the number of users who click on their ad and are referred to a page with a conversion tracking tag. However, they do not have access to information that would allow them to identify any user.
6. If you do not want to participate in conversion tracking, you can opt-out by disabling the option to set cookies in your browser. You will then not be included in the conversion tracking statistics.
7. Based on Google Consent Mode v2, Google also uses two new cookie types: `ad_user_data` and `ad_personalization`, which are based on the consent of the data subject and relate to the use and sharing of data. The `ad_user_data` is used to give Google consent to use user data for advertising purposes. The `ad_personalization` controls whether the data can be used for personalization of ads (e.g. remarketing). The data controller ensures that the appropriate consents are obtained or withdrawn on the cookie banner/panel. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.
8. Further information and Google's privacy statement can be found at: <https://policies.google.com/privacy>

Using Google Analytics

1. This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site you have visited.
2. The information generated by the cookies on the website used by the User is usually transferred to a Google server in the USA and stored there. By activating the IP anonymisation on the website, Google will previously shorten the IP address of the User within the Member States of the European Union or in other states party to the Agreement on the European Economic Area.
3. The full IP address will be transmitted to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity for the website operator and to provide other services relating to website activity and internet usage.
4. The IP address transmitted by the User's browser within the framework of Google Analytics will not be merged with other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may also prevent Google from collecting and processing information about your use of this website (including your IP address) by means of cookies by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=hu>

Newsletter, DM activity

1. Pursuant to Article 6 of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activity, the User may expressly consent in advance to the Service Provider contacting him/her with advertising offers and other mailings at the contact details provided at the time of registration.
2. In addition, the Customer may, subject to the provisions of this notice, consent to the processing of personal data by the Service Provider necessary for the sending of advertising offers.
3. The Service Provider will not send unsolicited commercial messages and the User may unsubscribe from receiving offers without any restriction and without giving any reason, free of charge. In this case, the Service Provider will delete all personal data necessary for sending advertising messages from its records and will not contact the User with further advertising offers. The User may unsubscribe from advertising by clicking on the link in the message.
4. The fact of collection, the scope of the data processed and the **purpose of the processing**:

Personal data	Purpose of data processing	Legal basis
Name, e-mail address.	Identification, to enable subscription to the newsletter/special offers.	Consent of the data subject, Article 6(1)(a). The essential characteristics of commercial advertising Act XLVIII of 2008 on the conditions and certain limitations of the use of the internet 6. § (5).
Date of subscription	Perform a technical operation.	
IP address at the time of subscription	Perform a technical operation.	

5. **Data subjects**: all data subjects who subscribe to the newsletter.
6. **Purpose of data processing**: sending electronic messages (e-mail, SMS, push messages) containing advertising to the data subject, providing information about current information, products, promotions, new features, etc.
7. **Duration of data processing**, deadline for deletion of data: data processing lasts until consent is withdrawn (unsubscribe, request for deletion by the data subject) or until the newsletter is discontinued.
8. **Potential data controllers, recipients of personal data**: personal data may be processed by the data controller and its sales and marketing staff, in compliance with the above principles.
9. **Description of data subjects' rights in relation to data processing**:
 - The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and
 - object to the processing of your personal data; and
 - the data subject has the right to data portability and the right to withdraw consent at any time.

10. The data subject may request access to, erasure, modification or restriction of processing of personal data, data portability or objection to the processing of personal data in the following ways:

- by post to 4027 Debrecen, Füredi út 49-51,
- by e-mail at project@bestrong.com, by phone at • +36 70 935 7144.

11. The data subject **may unsubscribe** from the newsletter at any time, **free of charge**.

12. Please note that

- **the processing** is based on **your consent**.
- **must** provide personal information if you wish to receive newsletters from us. • failure to provide such information will **result** in you not being able to we can send you a newsletter.
- please note that you can withdraw your consent at any time by clicking on the unsubscribe button.
- the withdrawal of consent **does not affect the lawfulness of processing based on consent prior to its withdrawal**.

Complaints handling

1. The fact of collection, the scope of the data processed and the **purpose of the processing**:

Personal data	Purpose of data processing	Legal basis
Wiring and first name	Identification, contact.	Article 6(1)(c). (the relevant legal obligation is Article 17/A(7) of Act CLV of 1997 on Consumer Protection)
E-mail address	Staying in touch.	
Phone number	Staying in touch.	
Billing name and address	Identification of the ordered quality issues related to products/services objections, questions and problems Addressing.	

2. **Data subjects**: all data subjects who shop on the website and complain about quality.

3. **Duration of** data processing, deadline for deletion of data: copies of the record, transcript and reply to the objection shall be kept for 3 years pursuant to Article 17/A (7) of Act CLV of 1997 on Consumer Protection.

4. **Potential data controllers entitled to access the data, recipients of personal data**: personal data may be processed by the controller and by its authorised staff, in compliance with the above principles.

5. **Description of data subjects' rights in relation to data processing**:

- The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and
- the right to data portability and the right to withdraw consent at any time

6. **The data subject may request access to, deletion, modification or restriction of processing of personal data, or the portability of data in the following ways**:

- by post to 4027 Debrecen, Füredi út 49-51., by e-mail to• to project@bestrong.com, by e-mail to• by telephone to +36 70 935 7144.

7. Please note that

- the provision of personal data is based on a **legal obligation**.
- the processing of personal data **is a precondition** for the conclusion of the contract.
- **must** provide personal data in order for us to handle your complaint.
- failure to provide the data will **mean** that we will not be able to deal with your complaint.

Recipients to whom personal data are disclosed

"*recipient*" means a natural or legal person, public authority, agency or any other body to whom or with which personal data is disclosed, whether or not a third party.

1. Processors (who carry out processing on behalf of the controller)

The data controller uses data processors to facilitate its own data processing activities and to fulfil its contractual and legal obligations with data subjects.

The controller places great emphasis on using only processors that provide adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the requirements of the GDPR and to protect the rights of data subjects.

The processor and any person acting under the control of the controller or the processor who has access to the personal data shall process the personal data covered by this Policy only in accordance with the instructions of the controller.

The controller is legally responsible for the activities of the processor. A processor is liable for damage caused by processing only if it has failed to comply with the obligations specifically imposed on processors by the GDPR or if it has disregarded or acted contrary to lawful instructions from the controller.

The data processor has no substantive decision-making power with regard to the processing of the data. The data controller may use a hosting service provider to provide the IT background and a courier service as a data processor for the delivery of ordered products.

2. Some data processors

Data processing activities	Name, address, contact details
Hosting service	Wix Online Platforms Limited 1 Grant's Row, Dublin 2 D02HX96, Ireland privacy@wix.com www.wix.com
Other data processing (e.g. online billing, web development, marketing)	

"*third party*": a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data.

3. Transfer of data to third parties

Third party data controllers, on their own behalf and in accordance with their own privacy policies

process the personal data we provide to them properly.

Activity of the Data Controller	Name, address, contact details
Transport	DHL Express Hungary Ltd. 1097 Budapest, Fehérakác utca 3: http://www.dhl.hu/hu/jogi_informaciok.html#privacy Phone: +36 1 2 45 45 45 MPL Hungarian Postal Logistics Ltd. 1138 Budapest, Dunavirág utca 2-6. ugyfelszolgalat@posta.hu Telephone: (06-1) 767-82-82 GTC: https://www.posta.hu/ugyfelszolgalat/aszf Privacy Policy: https://www.posta.hu/adatkezelesi_tajekoztato
Online payment	Stripe Inc. web: https://stripe.com email: support@stripe.com . Headquarters 185 Berry Street Suite 550. San Francisco, CA 94107

Community sites

1. Fact of data collection, scope of data processed: name registered on Twitter/Pinterest/Youtube/Instagram/TikTok/Linkedin etc. social networking sites, and the user's public profile picture.
2. Data subjects: all data subjects who have registered on Twitter/Pinterest/Youtube/Instagram/TikTok/Linkedin etc. social networking sites and have "liked" the Service Provider's social networking site or contacted the data controller via the social networking site.
3. Purpose of data collection: to share, "like", follow or promote certain content, products, promotions or the website itself on social networking sites.
4. Duration of data processing, time limit for deletion of data, the identity of the possible controllers entitled to access the data and the rights of the data subjects in relation to data processing: the data subject can find out about the source of the data, the processing of the data and the method and legal basis of the transfer on the relevant Community site. The data are processed on the social networking sites, so the duration of the processing, the way in which the data are processed and the possibilities for deleting and modifying the data are governed by the rules of the social networking site concerned.
5. Legal basis for processing: the data subject's voluntary consent to the processing of his or her personal data on social networking sites.

Facebook / Meta shared data management

The Data Controller has a Facebook / Meta profile for the activity. The processing of data for statistical purposes on the Facebook community page is a joint processing between the Data Controller and Facebook Ireland Ltd. Details of the joint processing agreement are set out in the Data Controller Appendix of the Facebook Page Analytics function. The Appendix is available at the following link:

https://www.facebook.com/legal/terms/page_controller_addendum The Data Controller will communicate by private message on the social networking site only if you contact us there.

1. Categories of persons concerned

- the data subject who has registered on the social networking site and "liked" the profile page of the Data Controller,
- a data subject who contacts the Data Controller by private message on the social networking site.

2. Purpose of data processing

The purpose of data processing on Facebook is to share and promote the activities and services of the data controller. The data provided by the data subject in a private message may be used by the Data Controller to reply to the message, otherwise the Data Controller does not collect data through the social networking sites, nor does it extract data from them.

3. Legal basis for processing

The processing is based on Article 6(1)(a) of the GDPR, the legal basis for the processing is the data subject's consent to the processing of his or her personal data on the Facebook social networking site.

4. Scope of the data processed

- registered name of the person concerned,
- public profile picture of the user concerned
- other public data provided and shared by the data subject on the Community site

5. Source of the personal data processed: the source of the data processed is the data subject.

6. Withdrawing consent: you can withdraw your consent to data processing at any time, and you can delete your post or comment. You can withdraw your consent or cancel your post, remove or delete your personal data.

operator. If you withdraw your consent, the Data Controller will delete the conversation with you. The withdrawal of consent shall not affect the lawfulness of the processing based on consent prior to the withdrawal.

Access, erasure, modification, or blocking of personal data.

the restriction of processing and the portability of data can be initiated by the data subject in the following ways:

- by post to 4027 Debrecen, Füredi út 49-51,
- by e-mail at project@bestrong.com, by phone at +36 70 935 7144.

7. Duration of processing

- until the data subject's consent is withdrawn,
- 2 years if there is an exchange of messages.

8. Transfers of personal data, recipients and categories of recipients: see Article 4(9) GDPR for the concept of recipient. The Data Controller shall only transfer the Data Subject's personal data to public bodies and authorities, in particular courts, prosecutors' offices, investigative authorities and law enforcement authorities, the National Authority for Data Protection and Freedom of Information, in exceptional cases and on the basis of a legal obligation.

9. Possible consequences of non-disclosure

In the event of non-disclosure, the data subject is not able to find out about the activities and services of the Data Controller via the Facebook community page, or send a message to the Data Controller via Facebook Messenger.

10. Automated decision making (including profiling): no automated decision making, including profiling, will take place during the processing.

11. Joint data controller agreement with Facebook Ireland Ltd:

The Page analytics feature displays aggregated data that helps you see how people use your Facebook page. Facebook Ireland Limited ("Facebook Ireland") and the Controller are joint controllers of analytics data. The Page Analytics Appendix sets out the responsibilities of Facebook and the Data Controller in relation to the processing of analytics data. Facebook Ireland accepts primary responsibility under the GDPR for the processing of Analytics Data and for complying with all applicable obligations under the GDPR in relation to the processing of Analytics Data.

Facebook Ireland will also make an extract of the Site Analytics Appendix available to all data subjects. The Data Controller will ensure that it has an adequate legal basis under the GDPR to process the analytics data, identify the data controller of the Page and comply with all other relevant legal obligations. Facebook Ireland is solely responsible for the processing of personal data in connection with the Page Analytics feature, except for data within the scope of the Page Analytics Appendix. The Page Analytics Appendix does not grant the Controller the right to request personal data of Facebook users that Facebook Ireland processes in connection with Facebook, including Page Analytics data. The Data Controller may not act on behalf of Facebook Ireland in fulfilling data protection requests and may not

can give you the answer.

Customer relations and other data management

1. If the data subject has any questions or problems when using our services, he or she can contact the data controller by the means indicated on the website (telephone, e-mail, social networking sites, etc.).
2. The Data Controller deletes the data provided by e-mails, messages, telephone, Meta, etc., together with the name and e-mail address of the interested party and other personal data voluntarily provided by the interested party, after a maximum of 2 years from the date of the communication.
3. Information about data processing not listed in this notice is provided at the time of collection.
4. In exceptional cases, the Service Provider shall be obliged to provide information, disclose data, hand over data or make documents available upon request of a public authority or upon request of other bodies on the basis of a legal authorisation.
5. In such cases, the Service Provider shall disclose personal data to the requesting party only to the extent and to the extent strictly necessary for the purpose of the request, provided that the requesting party has indicated the exact purpose and scope of the data.

Rights of data subjects

1. Right of access

You have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is taking place, you have the right to access your personal data and the information listed in the Regulation.

2. The right to rectification

You have the right to have inaccurate personal data relating to you corrected by the controller without undue delay at your request. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

3. The right to erasure

You have the right to have personal data concerning you erased by the controller without undue delay at your request, and the controller is obliged to erase personal data concerning you without undue delay under certain conditions.

4. The right to be forgotten

If the controller has disclosed the personal data and is required to delete it, it will take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that you have requested the deletion of the links to or copies of the personal data in question.

5. Right to restriction of processing

You have the right to have the controller restrict processing at your request if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction applies for the period of time that allows the controller to verify the accuracy of the personal data;
- the processing is unlawful and you object to the deletion of the data and instead request the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;
- you have objected to the processing; in this case, the restriction applies for the period until it is established whether the controller's legitimate grounds prevail over your legitimate grounds.

6. The right to data portability

You have the right to obtain from a data controller, in relation to you, the information

receive the personal data provided to him/her in a structured, commonly used, machine-readable format and have the right to transmit these data to another controller without hindrance from the controller to whom the personal data have been provided (...)

7. The right to protest

In the case of processing based on legitimate interest or public authority as legal grounds, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data by (...), including profiling based on these provisions.

8. Objection in the case of direct acquisition

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data may no longer be processed for those purposes.

9. Automated decision-making on individual matters, including profiling You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. The previous paragraph does not apply where the decision:

- necessary for the conclusion or performance of a contract between you and the controller;
- is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- Based on your explicit consent.

Deadline for action

The controller shall inform you of the action taken on such requests without undue delay and in any event within 1 month of receipt of the request.

If necessary, this **can be extended by 2 months**. The data controller will inform you of the extension, stating the reasons for the delay, **within 1 month** of receipt of the request.

If the controller fails to act on your request, **it will inform you without delay and at the latest within one month of receipt of the request of the reasons for the failure to act, of the** possibility to lodge a complaint with a supervisory authority and of your right to judicial remedy.

Security of data processing

The controller and the processor shall implement appropriate technical and organisational measures, taking into account the state of the art and the cost of implementation, the nature, scope, context and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons, in order to ensure a level of data security appropriate to the level of risk, including, where appropriate:

1. the pseudonymisation and encryption of personal data;
2. the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
3. in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;
4. a procedure to test, assess and evaluate regularly the effectiveness of the technical and organisational measures taken to ensure the security of processing.
5. Processed data must be stored in a way that does not allow unauthorised access. In the case of paper-based data carriers, by establishing physical storage and filing arrangements, and in the case of data in electronic form, by using a centralised access management system.
6. The method of storing the data by computerised means must be chosen in such a way that they can be erased, also taking into account any different erasure deadline, at the end of the erasure deadline or if otherwise necessary. Erasure shall be irreversible.
7. Paper-based data media should be shredded or personal data should be removed by an external organisation specialised in shredding. In the case of electronic data media, physical destruction and, where necessary, prior secure and irretrievable deletion of the data shall be ensured in accordance with the rules on the disposal of electronic data media.
8. The controller will take the following specific data security measures:

In order to ensure the security of personal data processed on paper, the Service Provider applies the following measures (*physical protection*):

1. Store the documents in a secure, lockable, dry place.
2. Where personal data processed on paper are digitised, the rules applicable to digitally stored documents apply
3. The Service Provider's data controller shall, in the course of his/her work, only

leave the premises where data are being processed, lock the data media entrusted to him or close the premises.

4. Personal data can only be accessed by authorised persons and cannot be accessed by third parties.
5. The Service Provider's building and premises are equipped with fire and property protection equipment.

IT security

1. Computers and mobile devices (other data carriers) used in the course of data processing are the property of the Service Provider.
2. The computer system containing personal data used by the Service Provider is protected against viruses.
3. To ensure the security of digitally stored data, the Service Provider uses data backups and archiving.
4. Access to the central server machine is only allowed to authorised and designated persons.
5. Access to data on computers is only possible with a username and password.

Informing the data subject about the personal data breach

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject without undue delay. The information provided to the data subject shall **clearly and prominently** describe the nature of the personal data breach and provide the name and contact details of the data protection officer or other contact person who can provide further information; describe the likely consequences of the personal data breach; describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

The data subject need not be informed if any of the following conditions are met:

- the controller **has implemented appropriate technical and organisational protection measures** and these measures have been applied to the data affected by the personal data breach, in particular measures, such as the use of encryption, which **render the data unintelligible** to persons not authorised to access the personal data;
- the controller has taken additional measures following the personal data breach **to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise**;
- information **would require a disproportionate effort**. In such cases, the data subjects should be informed by means of publicly disclosed information or a similar measure should be taken to ensure that the data subjects are informed in an equally effective manner.

If the controller has not yet notified the data subject of the personal data breach, the supervisory authority may, after having considered whether the personal data breach is likely to present a high risk, order the data subject to be informed.

Reporting a data protection incident to the authority

The data protection incident shall be notified by the controller to the supervisory authority competent under Article 55 without undue delay and, where possible, no later than 72 hours after the data protection incident has come to its attention, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by the reasons justifying the delay.

Review in case of mandatory data processing

If the duration of the mandatory processing or the periodic review of its necessity is not specified by law, local government regulation or a binding legal act of the European Union, **the controller shall review, at least every three years from the start of processing, whether** the processing of personal data processed by the controller or by a processor acting on its behalf or under its instructions **is necessary** for the purposes of the processing.

The data controller shall **document** the circumstances and the results of this review, **shall keep this documentation for ten years after the review** and shall make it available to the National Authority for Data Protection and Freedom of Information (hereinafter referred to as "the Authority") upon request.

Complaint possibility

Complaints against possible infringements by the data controller can be lodged with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information

1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: 1363 Budapest, Pf. 9.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Closing words

The following legislation has been taken into account in the preparation of this information:

- 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/EC (General Data Protection Regulation) (GDPR) (27 April 2016);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Infotv.);
- Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services (in particular § 13/A);
- Act XLVII of 2008 - on the prohibition of unfair commercial practices against consumers;
- Act XLVIII of 2008 - on the basic conditions and certain restrictions of economic advertising activities (in particular § 6);
- Act XC of 2005 on Freedom of Electronic Information;
- Act C of 2003 on Electronic Communications (specifically § 155);
- Opinion No 16/2011 on the EASA/IA Recommendation on best practice for behavioural online advertising;
- Recommendation of the National Authority for Data Protection and Freedom of Information on the data protection requirements for prior information.