

## **PRIVACY POLICY**

### **ON THE HANDLING OF PERSONAL DATA, WITH OCCASIONAL CONTRIBUTION**

#### **ON THE PART OF THE DATA CONTROLLER ON THE PART OF THE NATURAL PERSONS WHO ARE REPORTING ACCORDING TO THE INFORMER**

European Parliament and Council (EU) Regulation 2016/679 of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and the free flow of such data, as well as the repeal of Directive 95/46/EC (hereinafter: GDPR or General Data Protection Regulation) based on Articles 13 and 14, the data controller provides the data subjects with the following information regarding the management of their personal data.

This Data Management Notice refers to the procedure for receiving and investigating reports of events, complaints and risks that violate the organizational integrity of the data controller as defined in point 1), which is suitable for ensuring the enforcement of ethical values and integrity in all areas of activity, as well as the effective prevention of corruption and abuse for prevention.

In addition, data controller CXXII of 2009 on the more economical operation of publicly owned economic companies. Act, and 339/2019 on the internal control system of publicly owned economic companies. (XII. 23) In order for the data controller to comply with the relevant regulations of the Government Decree, the personal data of the concerned natural persons and of the notifying natural persons is handled.

This Data Management Information Sheet applies to the processing of personal data by the data controller for the purpose of investigating incidents that violate the integrity of the personal data of natural persons reporting to the data controller in the above scope.

In the case of the persons affected by the notification, the legal basis for the data processing of the data controller is the legitimate interest of the data controller.

In which we inform you, as a visitor of our website, as well as a user of my services and partner services, about the data management and data protection rules.

#### **1. What basic principles do I follow during data management?**

I follow the following basic principles when handling your data:

- a) I handle personal data legally and fairly, as well as transparently for you.
  - b) I collect personal data only for specific, clear and legitimate purposes and do not process them in a manner incompatible with the purposes.
  - c) the personal data I collect and manage are appropriate and relevant for the purposes of data management, and are limited to what is necessary.
  - d) I will take all reasonable measures to ensure that the data I manage are accurate and, if necessary, up-to-date, and I will immediately delete or correct inaccurate personal data.
  - e) I store personal data in such a way that you can only be identified for the time necessary to achieve the goals of personal data management.
  - f) by applying appropriate technical and organizational measures, I ensure adequate security of personal data against unauthorized or illegal processing, accidental loss, destruction or damage.
- your personal data
- a) on the basis of your prior informed and voluntary consent and only to the extent necessary and in all cases subject to purpose, i.e. collect, record, systematize, store and use.
  - b) in some cases, the handling of your data is based on legal regulations and is mandatory, in such cases I draw your attention to this fact.

c) and in certain cases, the management of your personal data or a third party has a legitimate interest, for example the operation, development and security of our website.

## **2. In connection with this information, the data controller**

Data controller: Adam Nagy  
seat: Komárom-Esztergom county, 2543 Sutto, Walnutvalley street, map number: 098/40  
address: Komárom-Esztergom county, 2543 Sutto, Walnutvalley street, map number: 098/40  
Contact: email, contact section  
My website is: [www.nagyadamworks.com](http://www.nagyadamworks.com)  
My email address is: [info@nagyadamworks.com](mailto:info@nagyadamworks.com)  
Phone number: on request

I am not obliged to appoint a data protection officer based on Article 37 GDPR

Name, address and contact information of my storage service provider: Nethely Kft 1115 Budapest, Halmi utca 29.

The data I manage:

When visiting my website, the name of my activity and the purpose of data management:

- the aim is to ensure the proper and high-quality operation of the website,
- checking and improving the quality of my services,
- identification of malicious visitors attacking my website,
- to measure attendance,
- statistical purposes.

The managed data is the IP address, the time of the visit, the data of the sub-pages visited, the type of operating system and browser you use, which they keep for 1 month.

Registration on the website with the consent of surname and first name in order to notify about downtime, changes in my contact information, etc. Its goal is to provide my visitors with a more complete user experience. Until registration is canceled or consent is revoked.

The purpose of the newsletter service is to keep in touch, to inform you about new promotions, new products and services until you unsubscribe from the newsletter.

The purpose of the direct marketing service is to contact you at your e-mail address for the purpose of obtaining business, as I am sending information about products and services that I distribute or that are distributed by a partner. Right up to unsubscribing from the direct marketing service.

I will keep your data (your full name, e-mail address, phone number, mailing address, other personal messages) for administration, comments, complaints and responses for the duration of the data management, based on the legal obligations described in point 7.

I only ask my website visitors for their personal data if they want to send a message, register, or log in.

I cannot connect the personal data provided in connection with the registration or the use of my marketing services, and the identification of our visitors is basically not my goal.

You can ask [info@nagyadamworks.com](mailto:info@nagyadamworks.com) or the contact section for more information with your questions about data management.

## **3. Amain legislation regarding this data management**

- GDPR

- CXII of 2011 on the right to information self-determination and freedom of information. law
- CXXII of 2009 on the more economical operation of publicly owned economic companies. Act, as well as on the internal control system of publicly owned economic companies 339/2019. (XII. 23) Government decree

#### **4. The legal basis for data management is point a) of Article 6 (1) of the GDPR (data management based on consent)**

#### **5. The purpose of data management is to investigate incidents that violate integrity when reported by the data controller.**

#### **6. Ascope and source of managed data**

Why is it necessary to name the data circles?

Name is required for natural personal identification.

Any other personal data voluntarily provided by the notifier in his notification is necessary to identify the natural person.

E-mail address for notification of the initiation or rejection of the investigation.

Source of processed data: directly from the relevant notifier

#### **7. Duration of data management:**

Until the consent of the person concerned is voluntarily withdrawn, otherwise for 5 years from the end of the investigation.

#### **8. Data security**

The data controller stores the personal data provided by the data subject at the data controller's registered office or registered office.

The data controller uses appropriate information security measures to ensure that the data subject's personal data is protected, among other things, against unauthorized access or unauthorized changes. Thus, for example, access to personal data stored on servers is logged, on the basis of which it is always possible to check who, when and what personal data was accessed. The data controller uses appropriate organizational measures to ensure that personal data cannot become accessible to an unspecified number of persons.

#### **9. Other**

Personal data will not be forwarded to third countries or international organizations.

No automated decision-making or profiling takes place during the personal data management detailed in this data management information sheet.

This data management information is available at [www.nagyadamworks.com/privacy-policy/adatkezelesi-tajekoztato.php](http://www.nagyadamworks.com/privacy-policy/adatkezelesi-tajekoztato.php).

The data controller reserves the right to unilaterally modify this Information for the future. The affected parties are informed of the amendments via the website of the data controller.

Providing personal data is up to you.

You may voluntarily withdraw your consent at any time, however, the withdrawal of consent does not affect the legality of the data processing before the withdrawal.

In connection with the use of services related to the information society, the processing of the personal data of a child under the age of 16 is only legal if and to the extent that the consent was given or authorized by the person exercising parental supervision over the child.

## **10. The rights related to data management and the possibilities of legal enforcement and legal remedies related to data management**

### **10.1. Rights related to data management**

The data subject can request the following from the data controller:

- inform you about the processing of your personal data (before data processing begins and during data processing)
- access to your personal data (the provision of your personal data by the data controller),
- correcting and supplementing your personal data,
- deletion or restriction (blocking) of your personal data, except for mandatory data processing,
- you have the right to data portability,
- you can object to the processing of your personal data.

According to point 10.2, the affected person can submit his data subject request in writing to the data controller. The data controller fulfills the legitimate request of the data subject within a maximum of one month and notifies him of this in a letter sent to the contact address provided by him.

#### **10.1.1. The right to request information (based on Articles 13-14 of the General Data Protection Regulation)**

According to point 10.2, the person concerned may request information from the data controller in writing that

- what personal data,
- on what legal basis,
- for what purpose of data management,
- from what source,
- how long you treat it,
- does it employ a data processor, and if so, the name, address and activity related to data management of any data processor,
- to whom, when, on the basis of which legislation, to whom did the data controller grant access to his personal data or to whom did he transmit his personal data,
- the circumstances, effects of the possible data protection incident and the measures taken to prevent it.

#### **10.1.2. The right to access (based on Article 15 of the General Data Protection Regulation)**

The data subject has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data processing is in progress, he is entitled to receive access to his personal data, and this from the data controller in accordance with Article 10.2. you can request it in writing according to point.

The data controller provides the data subject with a copy of the personal data that is the subject of data management - if this does not conflict with other legal obstacles. If the data subject submitted the request electronically, the information must be provided in a widely used electronic format, unless the data subject requests otherwise.

### **10.1.3. Right to correction and addition (based on Article 16 of the General Data Protection Regulation)**

The person concerned is the person referred to in 10.2. point, you can request in writing that the data manager amend any of your personal data (for example, you can change your e-mail address or postal contact information at any time or request that any inaccurate personal data managed by the data manager be corrected by the data manager).

Taking into account the purpose of the data management, the data subject is entitled to request the appropriate addition of incomplete personal data managed by the data controller.

### **10.1.4. The right to deletion (based on Article 17 of the General Data Protection Regulation)**

According to point 10.2, the affected person may request the deletion of his personal data from the data controller in writing.

The deletion of personal data can basically be requested if our data management is based on your consent, in which case we will delete your personal data.

### **10.1.5. The right to blocking (change during data processing) (based on Article 18 of the General Data Protection Regulation)**

The person concerned is the person referred to in 10.2. point, you can request in writing that your personal data be blocked by the data controller (by clearly indicating the limited nature of data processing and ensuring that it is handled separately from other data).

The blocking lasts as long as the reason specified by the data subject makes it necessary to store the data.

The data subject may request the blocking of the data, for example, if he believes that his report was handled illegally by the data controller, but for the sake of the official or court proceedings initiated by him, it is necessary that the report is not deleted by the data controller. In this case, the data manager will continue to store the personal data (for example, the given report) until the authority or the court requests it, after which the data will be deleted.

### **10.1.6. Right to data portability (based on Article 20 of the General Data Protection Regulation)**

The person concerned is the person referred to in 10.2. point, you can request in writing to receive the personal data concerning you that you have provided to the data controller in a segmented, widely used, machine-readable format, and you are also entitled to transmit your data to another data controller without the data controller preventing this, if:

- data management based on consent according to point a) of Article 6 (1) or point a) of Article 9 (2) of the General Data Protection Regulation, or
- is based on a contract according to Article 6, paragraph (1), point b), and
- data management is automated.

## **10.2. Legal enforcement and legal remedies related to data management**

### Finding the data controller

I recommend that before initiating court or official proceedings, you should kindly send your inquiry or complaint regarding the handling of your personal data to the data controller, so that I can investigate and resolve it satisfactorily, and fulfill any of your requests or demands according to point 10.1 - if they are well-founded.

The data controller is the person concerned 10.1. in the case of asserting a right related to data management, requesting information related to data management, or protesting or complaining about data management, investigate the matter without undue delay, within the time prescribed by the current legislation, take action in connection with the request and provide information on the matter to the person concerned. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended as stated in the legislation.

If the data subject submitted the request electronically, I will provide the information electronically, if possible, unless the data subject requests otherwise. If the data controller does not take action based on the data subject's request without delay, but no later than within the deadline specified in the law, it shall inform the data subject of the reasons for the failure to take action, the refusal to fulfill the request, and that the data subject may initiate court or official proceedings in his case as described below.

In order to enforce your rights related to data management or if you have any questions or doubts about your data managed by the data controller, or if you want to request clarification, file a complaint or exercise any of your rights according to point 10.1, you can do so by so-called as a request by e-mail via the contact details of the data controller specified in point 1.

### Initiating legal proceedings

In connection with the data processing operations within the scope of the data controller or the data processor, the data subject may go to court against the data processor if, according to his judgment, the data controller or the data processor entrusted by him or acting on the basis of his instructions has used his personal data in accordance with the law on the management of personal data or the European Union is treated in violation of the regulations specified in its mandatory legal act. Adjudication of the lawsuit falls within the jurisdiction of the court. At the choice of the data subject, the lawsuit can also be initiated before the competent court of the data subject's place of residence or residence.

### Initiation of authority proceedings

The data subject is at the National Data Protection and Freedom of Information Authority (1055 Budapest, Falk Miksa utca 9-11, website: <http://naih.hu>; postal address: 1363 Budapest, Pf. 9.; telephone: +36-1-391-1400 ; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) can initiate an investigation or an official procedure in order to assert its rights, citing that a violation of rights has occurred in connection with the processing of your personal data, or there is an immediate threat of such violation exists, so in particular,

- if, in his opinion, the data controller violates the provisions of 10.1. restricts the enforcement of the rights of the data subject specified in point 1 or rejects the request for the enforcement of these rights (initiation of an investigation), and
- if, in your opinion, the data controller, or the data processor acting on the basis of his or her mandate, violates the regulations regarding the handling of personal data, as defined in law or in a binding legal act of the European Union (request for the conduct of an official procedure), during the processing of your personal data.

## 11. What are cookies and how do I manage them?

Cookies are small data files (hereinafter: cookies) that are transferred to your computer through the use of the website, saved and stored by your Internet browser. The majority of the most commonly used Internet browsers (Chrome, Firefox, etc.) accept and allow the download and use of cookies as a default setting, but it is up to you whether you refuse or disable them by changing the browser settings, as well as the cookies already stored on your computer can delete it. The "help" menu item of each browser provides more information on the use of cookies.

There are cookies that do not require your prior consent. My website provides brief information about these at the start of your first visit, such as authentication, multimedia player, load balancer, session cookies that help customize the user interface, and user-centered security cookies.

You will be informed about cookies that require consent - if the data management already starts when you visit the site - at the start of the first visit and I ask for your consent.

I do not use or allow cookies that allow third parties to collect data without your consent.

Accepting cookies is not mandatory, however, I take no responsibility if my website does not work as expected if cookies are not enabled.

## **12. What cookies do I use?**

System cookie, does not require consent, as it is a session cookie of the web application's firewall, which is used to prevent abuse against cross-referencing. Its purpose is to ensure the operation of the website. It is valid until the end of your browser session.

Tracking cookie, requires consent for personalization. The purpose of remembering your settings is to increase the efficiency of my service.

Tracking cookie (from a third party), does not require consent, as the Google Analytics web tracking service is used to identify new sessions and visitors. Its purpose is related to the services of third parties (e.g. Google) when visiting the website.

You can read more about third-party cookies here

<https://www.google.com/policies/technologies/types/>, and about data protection here

[https://www.google.com/analytics/learn/privacy.html ?hl=en](https://www.google.com/analytics/learn/privacy.html?hl=en) you can read.

## **13. What else do you need to know about data management related to my website?**

You voluntarily provide me with personal data during registration and contact, which is why I ask that you gradually ensure that your data is truthful, correct and accurate, because you are responsible for them. Incorrect, inaccurate or incomplete data can be an obstacle to the use of our services.

If you do not provide your personal data, but someone else's, I believe that you have the necessary authorization.

You can withdraw your consent to data management at any time free of charge

- by canceling the registration,
- by withdrawing consent to data management, or
- by withdrawing or requesting the blocking of consent to the management or use of any data that must be filled in during registration.

For technical reasons, I undertake to register the withdrawal of consent within a day, but I would like to draw your attention to the fact that in order to fulfill my legal obligations or assert my legitimate interests, I may process certain data even after the withdrawal of consent.

In the event of the use of misleading personal data, or if one of our visitors commits a crime or attacks my system related to my website, I will immediately delete the data of that visitor at the same time as canceling their registration, and - if necessary - I will preserve them for the duration of the establishment of civil liability or the conduct of criminal proceedings.

## **14. What do you need to know about my data processing for direct marketing and newsletter purposes?**

You can give your consent to the use of your personal data for marketing purposes by making a statement during registration or later, by modifying your personal data stored on the newsletter and/or direct marketing registration interface (i.e. by clearly declaring your intention to consent). In this case -



until you withdraw your consent - I will process your data for direct marketing and/or sending newsletters and will send you advertising and other mailings as well as information and offers and/or forward newsletters (Grtv. § 6).

You can give your consent to direct marketing and the newsletter together or separately, and you can withdraw it/them free of charge and at any time.

In all cases, I consider cancellation of registration as withdrawal of consent. I do not interpret withdrawal of consent to data management for direct marketing and/or newsletter purposes as withdrawal of data management consent related to my website. How is this? what and on what basis do I keep it if the newsletter consent has been revoked? In the case of contributions, each contribution is for a specific purpose, so registering tomorrow and signing up for the newsletter are two separate purposes, two separate databases, the two cannot be related.

I undertake the registration of the withdrawal or cancellation of individual consents for technical reasons - with a deadline of one day.

## **15. Other data management issues**

I can only forward your data within the framework defined by law, and in the case of our data processors, I ensure by stipulating contractual conditions that they cannot use your personal data for purposes contrary to your consent. More information can be found in point 2.

I do not transfer data abroad.

The court, the prosecutor's office and other authorities (e.g. the police, the tax office, the National Data Protection and Freedom of Information Authority) may contact you to provide information, provide data or make documents available. In these cases, I have to fulfill my obligation to provide data, but only to the extent absolutely necessary to achieve the purpose of the request.

If there are contributors and employees involved in data management and/or data processing, they are entitled to know your personal data to a predetermined extent - subject to the burden of confidentiality.

I protect your personal data with appropriate technical and other measures, as well as ensure the security and availability of the data, as well as protect them from unauthorized access, alteration, damage, disclosure and any other unauthorized use.

As part of the technical measures, I use encryption, password protection and anti-virus software. However, I draw your attention to the fact that data transmission via the Internet cannot be considered a fully secure data transmission. I will do my best to make the processes as safe as possible, however, I cannot take full responsibility for data transmission through my website, but I will observe strict regulations regarding the data received in order to ensure the security of your data and to prevent illegal access.

Regarding security issues, I ask for your help in carefully saving your access password for my website and not sharing this password with anyone.

## **16. What are your rights and remedies?**

You about data management

- you can request information,
- you can request the correction, modification or addition of your personal data managed by me,
- you can object to data processing and request the deletion and blocking of your data (with the exception of mandatory data processing),
- you can take legal action in court,
- you can file a complaint with the supervisory authority or initiate a procedure (<https://naih.hu/adatkezeles-erintettjekent-fordulok-a-hatosaghoz>).



Supervisory Authority: National Data Protection and Freedom of Information Authority

- Headquarters: 1055 Budapest, Falk Miksa utca 9-11.
- Mailing address: 1363 Budapest, Pf. 9.
- Telephone: +36(1)391-1400
- Fax: +36(1)391-1410
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) Website: <https://naih.hu/>

Upon your request, I will provide information about the data managed by you or processed by me or by our commissioned data processor

- about your data,
- about their source,
- the purpose and legal basis of data management,
- its duration, and if this is not possible, the criteria for determining this duration,
- the name and address of our data processors and their activities related to data management,
- about the circumstances and effects of data protection incidents and the measures we have taken to avoid and prevent them, and
- in the case of transmission of your personal data, the legal basis and recipient of the data transmission.

I will provide the information as soon as possible, within 20 days (but no later than 1 month) from the submission of the application. The information is free of charge, unless you have already submitted an information request to me for the same data area in the current year. I will refund the reimbursement you have already paid in the event that I handled the data unlawfully. I can refuse the information only in cases provided for by law by indicating the legal place, as well as by informing about the possibility of judicial remedy or turning to the authorities.

I will notify you and all those to whom you previously forwarded the data for the purpose of data management about the correction, blocking, marking and deletion of personal data, unless the failure to notify does not harm your legitimate interests.

If I do not comply with your request for correction, blocking or deletion, I will notify you in writing or - with your consent - electronically within 20 days (but no later than 1 month) of receiving the request and reject it, then I will inform you of the legal remedy in court and the authority about the possibility of turning.

If you object to the processing of your personal data, I will examine the objection as soon as possible, within 20 days (but no more than 1 month) from the submission of the request and inform you of my decision in writing. If I have decided that your protest is well-founded, in that case I will terminate data management, including further data collection and transmission, and lock the data, as well as notify all those to whom the personal data affected by the protest was previously notified of the protest and the measures taken based on it forwarded, and who are obliged to take action to enforce the right to protest.

I refuse to comply with the request if I prove that the data processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the presentation, enforcement or defense of legal claims. If you do not agree with my decision, or if I miss the deadline, you can go to court within 30 days from the notification of the decision or the last day of the deadline.

Adjudication of data protection lawsuits falls under the jurisdiction of the court, the lawsuit can be initiated - at the choice of the data subject - before the court of the residence or place of residence of the data subject. A foreign citizen can also file a complaint with the competent supervisory authority according to his place of residence.

Please contact me at one of the contact details provided before contacting the supervisory authority or the court with your complaint, in order to negotiate and resolve the problem as quickly as possible.

## **17. What are the main governing laws for my activities?**

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing of personal data of natural persons (GDPR)
- CXII of 2011 on the right to information self-determination and freedom of information. law -(Infotv.)
- Act V of 2013 on the Civil Code (Ptk.)
- CVIII of 2001 on certain issues of electronic commercial services and services related to the information society. law -(Ekertv.)
- Act C of 2003 on electronic communications - (Ehtv)
- CLV of 1997 on consumer protection. law (Continued)
- CLXV of 2013 on complaints and notifications of public interest. law. (Pktv.)
- XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activity. law (Grtv.)

## **18. Modification of data management information**

I reserve the right to amend this data management information, of which I will inform those concerned in an appropriate manner. Information about data management is published on my website ([nagyadamworks.com/privacy-policy/adatkezelesi-tajekoztato.php](http://nagyadamworks.com/privacy-policy/adatkezelesi-tajekoztato.php)).

Sutto 10.01.2023