

**Lázár Lovaspark**

**Privacy Policy – Data Protection Guide (DPG)**

Made by:

CBA L és F Kft.

Approved by:

Mr. Zoltán Lázár

Effective date:

1st January, 2019

## **I. Preamble**

1. The CBA L és F Kft. as Data Controller hereby draws the attention of the Data subjects that if you want to be the user of the website, or wish to be the customer of the Data Controller, then carefully read the present Data Protection Guide.
2. Lázár Lovaspark operated by the Date Controller is dedicated to protecting the privacy of the Data subject. This Data Protection Guide explains the Data Controller's data managements and its main policies regarding to the personal information it manages.
3. For more information related to the data managements, please contact the Data Controller.

## **II. Data Controller**

1. According to the present Data Protection Guide, the Data Controller is:  
CBA L és F Kft.
  - i. Site and the address of the Lázár Lovaspark: 2182 Domony, Domonyvölgy, Fenyő utca 47.
  - ii. Company reg. number: 13-09-081074
  - iii. Tax nr: 10783933-2-13
  - iv. Phone: +36 28 576 510
  - v. E-mail: lazarlovaspark@lazarlovaspark.hu
  - vi. General manager: Mr. Lázár Zoltán managing director
  - vii. Website: <https://lazarlovaspark.hu/>
  - viii. Social networking websites:  
<https://www.facebook.com/lazarlovaspark/>;  
<https://www.instagram.com/explore/locations/251899854/lazar-lovaspark/>;  
<https://plus.google.com/114203283928090676589/>;  
<https://www.youtube.com/user/lazarpark/>
  - ix. DPO: Dr. Krisztian Bolcskei, [info@adatvedelmiauditor.hu](mailto:info@adatvedelmiauditor.hu)

## **III. The aim of the Data Protection Guide**

1. The Data Controller respects the personal rights of the Data Subjects, for example its Guests, hence it prepared this DPG which is available in electronic format at the Data Controller's website as well as in print format in the Lázár Lovaspark.
2. The present DPG is only a summary of the applied data protection policies in English. The internal data protection rules that the employees have to apply are in Hungarian. The aim of the DPG is to explain the data management procedures, methods how to protect the privacy of the Data subjects.

3. The Data Controller hereby states that it observes the provisions of
  - a) the Regulation (EU) 2016/679 of the European Parliament and of the Council,
  - b) the Act 112 of 2011 (hereinafter: "Data Protection Act") on the rights for information management and freedom of information,
  - c) Act 133 of 2005 and
  - d) other Hungarian acts and rules.

#### **IV. Definitions**

1. Data subject: any specific natural person identified or identifiable (directly or indirectly) based on the personal data, primarily data subject is the Guest or Contracting Party.
2. Data Controller: the natural or legal persons or organizations not having a legal personality, who or which determine the purpose of data management on its own or together with others, and make and carry out the decision regarding data management (including the equipment used), or have the data processor entrusted by them to carry out such decisions; Data Controller is determined in the chapter 2.
3. Personal data: any data that can relate to the data subject - especially the data subject's name, identification number, as well as one or more pieces of information characteristic of their physical, physiological, mental, economical, cultural or social attributes - and any such conclusions regarding the data subject that can be drawn from such data;
4. Consent: voluntary and specific expression of the data subject's intention, which is based on proper information and by which the data subjects provide a clear and unambiguous consent to managing their personal data comprehensively or for particular operations;
5. Objection: a statement by the data subjects in which they object to the management of their personal data and request the termination of data management and/or the deletion of the data managed;
6. Data management: regardless of the procedure applied; any operation or the whole of operations performed on data, specifically including the collection, recording, systematization, storage, modification, application, query, transfer, publication, harmonization or linking, blockage, deletion and destruction of data, as well as the prevention of the further usage of such data, photographing, audio or visual recording, as well as the recording of physical attributes suitable for the identification of a person (e.g.: finger- or palm prints, DNA samples, iris scans);

7. Data transfer: rendering data accessible for certain third parties;
8. Publication: rendering data accessible for the general public;
9. Data deletion: rendering data unrecognizable in such a manner that their restoration is no longer possible;
10. Tagging data: applying an identifying mark to the data in order to distinguish them;
11. Data blocking: applying an identifying mark to the data in order to block their management for a defined period of time or for good;
12. Data processing: performing any technical tasks related to data management operations, regardless of the method and equipment applied for the performance of such operations as well as of the place of application, provided that the tasks are performed in terms of data;
13. Data processor: natural or legal persons and/or organizations not having a legal personality, who or which perform data processing activities based on their contract with the data controller - including contracts concluded pursuant to legal provisions;
14. Third party: natural or legal persons and/or organizations without a legal personality, who or which are not identical with the data subject, the data controller or the data processor.
15. DPG means the present Data Protection Guide, available on the website and on the front office desk.

## **V. The scope of the DPG**

1. The DPG applies for data managements in the Lázár Lovaspark executed by the Data Controller.
2. According to the section 1, the present DPG describes the methods of the data managements.
3. The personal scope of the DPG is the Data Controller and the Data subject.
4. The present DPG is valid from 1<sup>st</sup> January, 2019.

## **VI. Rights of the Data subjects**

1. Data subjects have rights related to the data and data management.

2. *Data subjects may enforce their rights by sending request(s) to the Data controller's postal (2182 Domony, Domonyvölgy, Fenyő utca 47.) or e-mail address (lazarlovaspark@lazarlovaspark.hu), by phone, or personally, or any available contact form.*
3. Upon requests, the Data controller shall immediately take the necessary steps based on the request and inform the Data subjects about the taken steps.

**a. Right to information**

1. Upon requests sent by the Data subjects to the e-mail addresses in each chapter or addressed to the Data controller, the Data controller shall provide information regarding the particular subject's data managed by the Data controller; the source of such data; the purpose, legal basis and duration of the data management; the names and addresses of data processors as well as their activities related to data management; and (in the case of a transfer of the data subject's personal data) the legal basis and recipient of data transfer. Such information shall be provided within 15 days, free of charge once a year for identical data, and for a fee for all additional requests.
2. If the provision of information is denied, the Data controller shall inform the Data subject in writing as to which provision of which law was the legal basis, or which fact was to deny the information, and also inform the data subject regarding options for legal remedy.

**b. Corrections**

1. The Data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If the personal data are incorrect, and the correct data are available to the Data controller, it shall correct such personal data.
2. The Data controller shall inform the Data subject regarding the correction as well as all parties that may potentially have received the data from the Data controller for data management purposes. Such notice is omissible if the rightful interest of the Data subject is not violated in terms of the purpose of data management.

**c. Right to erasure and right to be forgotten**

1. The Data subject shall have the right to obtain from the Data controller the erasure of personal data concerning him or her without undue delay.
2. Where the Data controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the Data controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the Data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

**d. Right to restriction of processing**

1. The Data subject shall have the right to obtain from the Data controller restriction of data processing if the conditions (see GDPR Article 18.) are met.

**e. Right to object**

1. The Data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling.

**VII. Remedy**

1. If their privacy rights are probably breached or breached, Data subjects may request an investigation from the Hungarian National Authority for Data Protection and Freedom of Information. The contact details:
  - a) H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.
  - b) Phone: +36 -1-391-1400
  - c) Fax: +36-1-391-1410
  - d) E-mail: [privacy@naih.hu](mailto:privacy@naih.hu)
2. If their privacy rights are breached, Data subjects may file a lawsuit against the Data Controller. The court procedure shall be governed by the Data Protection Act, and the First Book, Chapter Three, Title XII (Sections 2:51 - 2:54) of Act V of 2013 concerning the Civil Code, and other relevant legal provisions.
3. The Data Controller shall provide information on the legal regulations laid out in this paragraph upon requests sent to [lazarlovaspark@lazarlovaspark.hu](mailto:lazarlovaspark@lazarlovaspark.hu)

**VIII. Compensation and injury claims**

1. If the Data Controller causes injury or violates the Data subject's privacy rights through handling the Data subject's data in an unlawful manner or through violating its data security requirements, then the affected party may demand an injury claim from the Data Controller.
2. The Data Controller shall be exempt from liability for the damage caused and from its obligation to compensate an injury claim, if it can prove that the damage or violation of the privacy rights of the affected party was caused by an unavoidable force falling outside the scope of data management.
3. The Data Controller shall be exempted from liability and its obligation to compensate an injury claim, if it can prove that the damage or violation of the privacy rights of the affected party was caused by an unavoidable force outside the scope of data management. The damage may not be compensated and an injury claim may not be demanded, if it was due to the willful or grossly negligent misconduct of the damaged party.

## **IX. Principles**

1. Personal data shall be:
  - a) processed lawfully, fairly and in a transparent manner in relation to the Data subject ('lawfulness, fairness and transparency');
  - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
  - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
  - d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
  - e) 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 stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes ('storage limitation');
  - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or

unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

2. The Data controller shall be responsible for, and be able to demonstrate compliance with section 1 ('accountability').

## **X. Legal basis of the data management**

1. The legal basis of the personal data management is:
  - a) the consent of the Data subject or
  - b) compulsory requirement by (the Hungarian or EU) law or
  - c) other basis allowing by Hungarian or EU law.
2. Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the Data subject's agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means.
3. If the management or processing of personal data based on mandatory by law, then the relevant rules are determining the purpose, the period of time, the handled data, the rights and obligations.
4. The Data Controller shall only manage personal data for pre-determined purposes, for the necessary period of time and in order to exercise its rights and fulfill obligations. The Data controller shall only manage such personal data that are indispensable and suitable for fulfilling the objective of the particular data management activity.
5. If the Data Controller uses the received data for any other purpose than the original purpose of data collection, the Data controller shall inform the Data subjects in each case and ask for their specific, prior consent and/or shall provide an opportunity for them to disallow such usage.
6. Personal data communicated to the Data Controller during the data management process shall only be disclosed to such persons contracted or employed by the Data Controller entrusted with duties in relation to the given data management process.

## **XI. The period of data management**

1. Data Controller shall manage the data until
  - a) the purpose of the data management is fulfilled;
  - b) the withdrawal of the voluntary consent;
  - c) the statutory time elapsed;
  - d) erasing the personal data.



## **XII. Data processor**

1. The Data processors are determined and named in the Annex 1.

## **XIII. Data transfer**

1. The Data controller has the right to transfer personal data handed over to business partners (compliance assistants) fulfilling the Data controller's obligation related to the Data subjects. Such data transfer may only take place if the Data subjects have been informed in advance accordingly, upon using the service(s).
2. In order to verify the legality of data transfer and inform the data subjects, the Data controller shall keep a data transfer log containing the time of transfer of the managed personal data, the legal basis and addressee of data transfer as well as the definition of the scope of the transferred personal data, and any data defined in the rule of law prescribing data management.

## **XIV. Miscellaneous rules, governing law, jurisdiction**

1. The applicable version of the DPG is continuously available on the website and on the front office desk.
2. The legal relationship between the Data Controller and the Data subject, and the data management shall be governed by the Hungarian law.

## **XV. Data managements**

1. These data managements are relevant for the foreign Data subjects, therefore they can find and read them in English, but the Data Controller has other data managements which do no effect the foreign Data subjects.
2. To fulfill the principle of transparency, the data managements are in the following tables:

### **Data management for one-time information request**

Aim	Legal basis	Data subjects	Period	Method	Source
providing relevant information to and contact with the Data subject.	Consent	Any natural person who claims information from the Data Controller	Until the aim is achieved or in limitation period (5 yrs)	electronically and/or paper-based, manually	Data subjects

### **Data management on regular contact**

For example: contacts with customers

Aim	Legal basis	Data subjects	Period	Method	Source
keeping in touch with the Data subject, answering questions, requests and more, marketing / sales activity	Consent or contract (GDPR, Article 6., 1.b) or legitimate interest	Any natural person who keeps in touch with the Data Controller	Until Data Controller receives the cancellation request from the Data subject, or until the aim is achieved, or in limitation period (5 yrs), or until the termination of a legitimate interest	electronically and/or paper-based, manually	Data subjects

### **Data management related to (special) offers**

Aim	Legal basis	Data subjects	Period	Method	Source
Providing a suitable offer for the Data subject, and contact with the Data subject	consent	Any natural person who requests an offer	in the validity period of the offer, or if the Data subject accepts the offer, Data Controller manages the data until the termination of the legal relationship between the Data Controller and Data subject	electronically and/or paper-based, manually	Data subjects

### **Data management related to entering into a contract**

Aim	Legal basis	Data subjects	Period	Method	Source
entering into a contract, fulfilling the contract	Contract (GDPR, Article 6., 1.b), but if the Data Subject is a contact person in the contract, then the legal basis is the legitimate interest	Any natural person who is entering into a contract with the Data Controller, or contact person in the contract	8 yrs based on the Act 100 of 2000.	electronically and/or paper-based, manually	Data subjects

### **Data management related to making appointment**

For example: reservation for riding.

Aim	Legal basis	Data subjects	Period	Method	Source
Making an appointment with the Data subject, keeping in touch	consent	Any natural person who makes an appointment	Until the aim is achieved, or in limitation period (5 yrs), or until the termination of a legitimate interest	electronically and/or paper-based, manually	Data subjects

### **Data management related to table-reservation**

Aim	Legal basis	Data subjects	Period	Method	Source
Making table-reservation, identifying the Data subjects, keeping in touch	consent	Any natural person who reserves a table in the restaurant	Until the aim is achieved	electronically and/or paper-based, manually	Data subjects

## **Data management related to entering a competition organized by the a Data Controller**

Aim	Legal basis	Data subjects	Period	Method	Source
Identifying the Data subject and checking the conditions of participation in the competition, and keeping in touch	consent, contract (GDPR, Article 6., 1.b), or legitimate interest	Any natural person who wishes to enter the competition organized by the Data Controller	In limitation period (5 yrs) or 8 yrs based on the Act 100 of 2000	Electronically and/or paper-based, manually	Data subjects

## **Data management related to responsible statements**

Aim	Legal basis	Data subjects	Period	Method	Source
Identifying the Data subject, making a responsible statement, and keeping in touch	legitimate interest	Any natural person who makes a responsible statement	6 months, but maximum in limitation period (5 yrs)	electronically and/or paper-based, manually	Data subjects

## **Surveillance**

Aim	Legal basis	Data subjects	Period	Method	Source
Aims in the camera policy, for example: personal protection, property protection	legitimate interest	Any natural person who is in area under surveillance	3 working days based on the Act 1033 of 2005.	electronically, automatized	Data subjects

## **Data management related to vouchers, coupons**

Aim	Legal basis	Data subjects	Period	Method	Source
purchasing vouchers, coupons, redemption,	consent or contract	Any natural person who wishes to purchase or redeem a voucher or a coupon.	validity period, in case of redemption 8 yrs based on the Act 100 of 2000.	purchasing: electronically and/or paper-based, manually. redemption: electronically, automatized	Data subjects

## **Data management related to complaint handling**

Aim	Legal basis	Data subjects	Period	Method	Source
Identifying the Data subject, filing a compliant	based on consent, but necessary based on the Act 155 of 1997.	Any natural person who is filing a compliant based on the consumer protection act	5 yrs based on the Act 155 of 1997.	electronically and/or paper-based, manually	Data subjects

## **Data management related to registering Data subjects**

Aim	Legal basis	Data subjects	Period	Method	Source
registering (storing data of the Data subjects) and	consent, or contract, or compliance with a legal	Any natural person who is guest, client or wishes to be guest	In limitation period (5 yrs) or 8 yrs based on the Act 100 of 2000 or	electronically (paper-based), manually	Data subjects, Partner

monitoring the Data subject or the fulfillment of the contract, fulfill the principle of accuracy	obligation, legitimate interest	or client, or a contact person of a partner, guest, client, or a future partner, guest, client	until the termination of a legitimate interest		
---	---------------------------------	--	--	--	--

### **Data management related to measuring customer satisfaction**

Aim	Legal basis	Data subjects	Period	Method	Source
improving the quality of services, products, controlling the behavior of employees, investigating potential complaints	legitimate interest	Any natural person, who participates in customer satisfaction measurement	Until the aim is achieved, and 5 yrs in case of complaint	electronically and/or paper-based, manually	Data subjects

### **Data management related to consents**

Aim	Legal basis	Data subjects	Period	Method	Source
proving the legal basis of the data management, fulfilling the action based on the consent, keeping in touch	consent	Any natural person, who gives a consent to the processing of her/his data for one or more specific purposes	Until Data Controller receives the cancellation request from the Data subject, in case of cancellation request, the request will be stored in the limitation period (5 yrs)	electronically and/or paper-based, manually	Data subjects

### **Data management related to making pictures, video/sound recordings about the Data subject**

Aim	Legal basis	Data subjects	Period	Method	Source
specific aim determined in the consent given by the Data subject	consent	Any natural person who contributes to make pictures, video/sound recording agrees for one or more specific purposes	Until Data Controller receives the cancellation request from the Data subject	electronically and/or paper-based, manually	Data subjects

### **Data management related to event organization**

Aim	Legal basis	Data subjects	Period	Method	Source
organizing an event, keeping in touch	consent, or contract, legitimate interest	Any natural person who attends at an event organized by the Data Controller	In limitation period (5 yrs) or 8 yrs based on the Act 100 of 2000	electronically and/or paper-based, manually	Data subjects

### **Data management related to newsletters**

Aim	Legal basis	Data subjects	Period	Method	Source
sending newsletters to the Data	consent	Any natural person who is subscribing to	until the unsubscribe	subscribing: electronically or paper-based,	Data subjects

subjects, informing the Data subject about news, events, special offers, etc.		newsletters		manually sending: electronically, automatized, unsubscribing: electronically or paper-based, manually	
---	--	-------------	--	---	--

### **Data management related to prize games organized by the Data Controller**

Aim	Legal basis	Data subjects	Period	Method	Source
participating in a prize game, identifying the Data subject, keeping in touch	consent	Any natural person who is participating in a prize game organized by the Data Controller	In limitation period (5 yrs) or 8 yrs based on the Act 100 of 2000	participating: electronically/paper-based, manually drawing: automatized or manually	Data subjects

### **Data management related to the marketing activity on the social network pages**

Aim	Legal basis	Data subjects	Period	Method	Source
Marketing of the Data Controller	Consent	Any natural person who is following, sharing, liking, etc. the content on the pages of the social network belonging to the Data Controller	Until Data Controller receives the cancellation request from the Data subject	Electronically, manually	Data subjects

### **Data management related to the bank transfers**

Aim	Legal basis	Data subjects	Period	Method	Source
Controlling of the financial fulfillment to and from the Data Controller	compliance with a legal obligation and/or contract	Any natural person who transfers amount to the Data Controller, or receives amount from the Data Controller	In limitation period (5 yrs) or 8 yrs based on the Act 100 of 2000	Electronically and/or paper-based, manually	Data subjects

### **Data management related to the job applications**

Aim	Legal basis	Data subjects	Period	Method	Source
Applying for a job, keeping in touch	Consent	Any natural person who is applying for a job, or send CV to the Data Controller	6 months based on the legitimate interest of the Data Controller (for a proof), in the period determined in the consent, or until Data Controller receives the cancellation request from the Data subject	Electronically and/or paper-based, manually	Data subjects

### **Data management related to accidents**

Aim	Legal basis	Data subjects	Period	Method	Source
identifying the Data subject,	compliance with a legal	Any natural person who is	5 yrs	Electronically and/or paper-	Data subjects, third parties

keeping in touch, taking legal actions if it is necessary	obligation, legitimate interest, vital interests of the data subject or of another natural person	involved in an accident		based, manually	
---	---	-------------------------	--	-----------------	--

### **Data management related to data transfer**

Aim	Legal basis	Data subjects	Period	Method	Source
Specific aim	compliance with a legal obligation, or consent, legitimate interest	Any natural person whose data shall be transferred to a third party	In limitation period (5 yrs) or 8 yrs based on the Act 100 of 2000	Electronically and/or paper-based, manually	Data subjects

Closed: 1<sup>st</sup> January, 2019

CBA L és F Kft.  
 Mr. Zoltán Lázár  
 Managing Director