

Sending a Newsletter

Summary of data procession related to sending newsletters						
Purpose	Legal grounds	Data Subject	Data category	Duration	Method	Source
to supply Data Subject with full or tailor made information of sales campaigns, events and news of Data Controller.	based on voluntary agreement	All natural persons who wish to be regularly informed of the news, sales campaigns and discounts of Data Controller , therefore they subscribe to the newsletter service and supply their personal data.	Please refer to the information/description of data processing	until unsubscription	subscription electronically or manually, on paper automated, electronic mailing unsubscription electronically or manually, on paper	Data Subject

1. Data Subjects may, during or before using the service, or in any other way, subscribe to the newsletter with their data defined below.

What is the legal ground of data procession?

2. Subscribing to the newsletter is based on voluntary decision.

Who are the Data Subjects?

3. Data Subjects: All natural persons who wish to be regularly notified of Data Controller's news, sales campaigns, initiatives, therefore subscribe to the newsletter service with supplying their personal data.

What data are used during data procession and with what objective?

4. Category of data and the objective or their use:

name	identification
e-mail address	sending the newsletter

What is the objective of data procession?

5. The objective of data procession related to the newsletter service is to regularly notify Data Subject of Data Controller's latest sales campaigns, events and news, in fact, it is a regularly forwarded advertising.

What is the duration of data procession?

6. Data Controller and Data Controller's processor may only process these personal data recorded for this purpose until
 - a. Data Subject unsubscribes the newsletter list, or
 - b. in case of requesting Data Subject's confirmation of their consent to using their data, the duration set for giving the consent expires, in case of such expiry of duration the data are to be deleted.

What is the method of data procession?

7. Method of data procession:
 - a. subscribing electronically or manually, on paper
 - b. sending the newsletter electronically, automated
 - c. unsubscribing electronically or manually, on paper

Where are the data from?

8. Source of data: directly from the Data Subjects.

Are any data forwarded to a third party?

9. Data forwarding: no data is forwarded to any third party unless Data Controller commissions a processor to send newsletters, prepare statistics, to process subscriptions and unsubscription. In such cases the data of processor are recorded in Annex II.

How does Data Controller guarantee the protection of the data?

10. Technical and organisation measures to ensure the protection of the data handled: see a special section.

Is there automated decision making or profile generation?

11. No automated decision making or profile generation occurs in the course of data procession.

Miscellaneous

12. Data Subject may unsubscribe the newsletter at any time through the link at the bottom of the email, or may request unsubscription via an email sent to lazarlovaspark@lazarlovaspark.hu

13. Data Subject may also unsubscribe the newsletter via mail sent by post to CBA L és F Kft., 2182 Domony, Domonyvölgy, Fenyő utca 47.

14. Data Controller is to revise the newsletter list in every three years and request Data Subject to confirm their consent to managing their data. Should a Data Subject fail to confirm their consent, their data is to be deleted from the database by Data Controller.

15. Data Controller prepares statistics about the newsletters being read by analysing the number of clicks on the links within the newsletters.

16. Data Controller notifies Data Subject that, should Data Subject fail to supply data marked with *, then Data Controller may refuse to provide their service (data procession).

The rights of Data Subject

The relationship between the rights of the Data Subjects and the legal ground is illustrated by the table below. Thus Data Subjects may clearly see what rights they have when applying the given legal ground.

	Right to access preliminary information	Right to access	Right of correction	Right to delete	Restriction	Data transferability	Objection	Withdrawing consent
Consent	✓	✓	✓	✓	✓	✓	✗	✓
Agreement	✓	✓	✓	✓	✓	✓	✗	✗
Legal obligation	✓	✓	✓	✗	✓	✗	✗	✗
Crucial interest	✓	✓	✓	✓	✓	✗	✗	✗
Public duty, Public authority right	✓	✓	✓	✗	✓	✗	✓	✗
Rightful interest	✓	✓	✓	✓	✓	✗	✓	✗

Right to prior information (Act CXII of 2011 on the right to informational self-determination and on the freedom of information, Section 14 a), GDPR articles 13-14)

Data Subject has the right to be informed of facts related to the procession of their data, prior to commencing the data procession. In relation to this right Data Controller is under obligation to so supply information, which – inter alia - is also fulfilled with this present document.

Right to access (GDPR article 15)

Data Subject has the right to receive feedback from Data Controller whether the procession of their personal data is in progress, and, if yes, Data Subject has the right to access to their data and to information on the conditions of data procession. Should personal data be forwarded to a third country or an international body, Data Subject has the right to receive information on on the transfer of their data, and their safe guarding in accordance to article 46 Data Controller shall provide access to information to the copy of the personal data if requested so by Data Subject.

The right to withdraw consent (GDPR article 7)

Data Subject has the right to withdraw their consent at any time. Withdrawing the consent does not affect the legality of data procession prior to the withdrawal.

The right to correction (GDPR article 16)

Data Subject is entitled to have their incorrect personal data corrected by Data Controller without unjustified delay upon request.

The right to objection (GDPR article 21)

Data Subject has the right, for personal reasons, to object at any time against their personal data being processed based on GDPR article 6, paragraphs (1) e or f).

In such cases Data Controller may not handle the process the data any longer, unless they can prove that the data procession is necessitated by such rightful reasons that have priority to the interests, rights and liberties of Data Subject.

The right to the restriction of data procession (GDPR article 18)

Data Subject is entitled to having Data Controller restrict the data procession in any conditions laid out in the GDPR are met, in such cases Data Controller may not carry out any operation with the data apart form storing the data.

If Data Subject has objected to their data being processed, the restriction applies until it is established whether Data Controller's rightful reasons have priority to Data Subject's rightful reasons.

The right to erasure (GDPR article 17)

Data Subject has the right to have their personal data applying to them deleted by Data Controller without unjustified delay if the procession of data has no objective, or Data Subject has withdrawn their consent and if there is no legal ground, or, in case of objection, there is no priority reason for the data procession, or the data was processed in an illegal manner in the first place, or if there is an obligation to delete the data in order to meet a legal requirement. If Data Controller published the personal data and is under obligation to delete them, they are obliged to take all rational and expectable measures, bearing in mind

the accessible technology and the costs of realisation – including technical measures – in order to notify data controllers processing the data of Data Subject's request to have deleted all the above mentioned data or the copies thereof or the links to the personal data.

The right to transferability (GDPR article 20)

Data Subject is entitled to receive their personal data previously supplied to Data Controller in a well structured, widely used, computer accessible format, furthermore, Data Subject is entitled to forward these data to another data controller without any hindrance on behalf of the data controller who was previously supplied these data if all legal conditions (legal ground of automated data procession and consent or agreement) are met.

Where and how can Data Subject receive detailed information about the procession and transfer of data, where and how can they exercise their rights?

Data Controller notifies Data Subjects that Data Subjects may exercise their rights of information, right to access and other rights with a declaration sent to Data Controller's email or postal address. Within the shortest possible period upon receiving that declaration, Data Controller examines and responds to the declaration as well as taking all necessary measures in accordance with the declaration, the Internal Data Protection Regulation and the legal rules.

The contacts of the authority in case of a complaint (GDPR article 77):

Nemzeti Adatvédelmi és Információszabadság Hatóság
(National Authority of Data Protection and Freedom of Information)
Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, Hungary
Telephone: +36 1 391 1400
Fax: +36 1 391 1410
www: <http://www.naih.hu>
e-mail: ugyfelszolgalat@naih.hu

Further information about your rights and the details of your complaint to be submitted to the authority is available at: <http://naih.hu/panaszuegyintezes-rendje.html>.

Data Subject may also turn to a court of law competent at their place of residence, should their rights be infringed, and -inter alia – may claim a penalty.

The court of law competent at your place of residence may be selected at: <https://birosag.hu/birosag-kereso>