

## Data processing related to placing order through the website

Summary of data processing related to placing order through the website						
Objective	Legal basis	Data Subjects	Category of Data	Duration	Method	Source
ordering the services of Data Controller, liaising	based on entering into agreement(GDPR article 6. (1) b)	All natural persons who, through the website, supply their data to order Data Controller's services outlined on the website	Please refer to the detailed information/description of data processing	Please refer to the information/description of data processing	Please refer to the information/description of data processing	directly from the Data Subject

1. Data Controller makes it possible for Data Subjects to, through Data Controller's website, order the services outlined on the website with supplying their data.

### **What is the legal basis for the data procession?**

1. The order is based on entering into agreement (GDPR article 6. (1) b).

### **Who are the Data Subjects?**

2. Data Subjects: all natural persons, who, through Data Controller's website, order the services outlined on the website with supplying their data.

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

3. Names of processed data and objective of procession:

Name*	identification, addressing
phone number*	liaising
e-mail address*	liaising
time*	providing service
number of participants*	providing service
invoice data*	invoicing
signalling subscription to the newsletter*	sending a newsletter

### **What is the objective of data procession?**

4. The objective of data procession is to order the services offered by Data Controller and liaising.

### **How is the data processed?**

5. Activities and processes affected by the data procession:
  - a. On a specified platform of the website Data Subject may supply their data outlined above and with a click they may forward them to Data Controller.
  - b. The supplied data are transferred to the server running the website through an encrypted channel.
  - c. Data Controller processes the data and contacts Data Subjects because of their registration. From this point the process may continue in other forms of data procession e.g. invoicing, correspondence, etc.

### **What is the duration of data procession?**

6. Duration of data procession:
  - a. until the objectives are realised; or
  - b. time of limitation, if legal consequence or a similarly significant interest is connected to the registration.

### **What is the method of processing the data?**

7. Method of data procession: electronically, entering manually, forwarding to the server automatically, procession manually.

### **Where are the data from?**

8. Data source: directly from the Data Subject.

### **Are any data transferred to third parties?**

9. Data communication: should Data Controller commission a data processor with tasks of data storage, then the data of this person is included in Annex II, otherwise no data is transferred to third parties, except for, if need be, court of law or any other authority.

### **How does Data Controller ensure the safeguarding of the data?**

10. Organisational and technical measures to ensure the protection of the processed data: the use of https protocols meeting the requirements of up to date science and technology; otherwise please refer to it in the special chapter.

**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. As far as data marked with \* are concerned: 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 Subject and the legal grounds is introduced by the table below, in order to make it clear for Data Subject what right they may exercise for 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 basis, 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, further more, 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 basis 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](mailto: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>