

CBA L és F Kft.
external information on data protection
(information available on the website)

CBA L és F Kft. (head office: 2182 Domony, Domonyvölgy, Fenyő utca 47., registry number: 13-09-081074, VAT number: 10783933-2-13, phone: +36 28 576 510, e-mail: lazarlovaspark@lazarlovaspark.hu, represented by: Zoltán Lázár managing director, data protection officer: Dr. Krisztián Bölcskei, info@adatvedelmiauditor.hu, dr.bolcskei.krisztian@adatvedelmiauditor.hu) as Data Controller, would like to give you a brief summary of their activities of data procession.

Data Controller would like to notify the Data Subjects of

- the ways how the Data Subjects may exercise their rights (right to access, right to erasure, right to restriction, right to objection and right to transferability). In such cases Data Subjects may send their declaration to lazarlovaspark@lazarlovaspark.hu or any other contact of Data Controller to exercise their rights. Further more, should their rights be infringed, Data Subjects may turn to the authorities (please find their contact details at www.naih.hu) or to a court of law competent in their area of residence, and may claim a penalty. Data Controller would like inform Data Subjects, that their exercising of their rights may have certain conditions or restrictions related to certain instances of data protection, these conditions are to be examined by Data Controller when Data Subjects exercise their rights. Should there be an case when Data Subject cannot exercise their rights in relation to their data being processed, then Data Controller is to inform Data Subject in writing (including electronic forms of writing) of the legal reason excluding/restricting the exercise of rights. Data Controller is to keep a record of such cases
- more detailed information on the individual instances of data procession is available in Annex I of the Internal Data Protection Regulations.
- No profile generation occurs in any phase of data procession.
- Data transfer to a third party may occur in the course of data procession, this is described in the detailed information of the data procession. Should any type of data described below data be transferred in the course of data procession, then the addressee of the transfer(data controller or data processor) is displayed in Annex II.
- cookie-related information is defined separately.

- The summary below includes all data processions carried out by Data Controller, except for those that apply to the staff of Data Controller.

Summarising table of the data procession of one-off cases of requesting and supplying information						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
supplying adequate information to Data Subject and the following correspondence accordingly	voluntary consent or fulfilling legal obligations or based on agreement or justified interest or crucial interest	All natural persons including a representative acting on behalf of an organisation who contacts Data Controller and requests/receives information from Data Controller	for details please refer to the information/description of data processing	until the realisation of the objectives or a request for deletion or a deadline specified in the law or expiry of limitation period or until justified interests cease to exist	electronically and/or manually, on paper	Data Subjects

Summarising table of the data procession in the course of liaising with Data Subject						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
liaising with Data Subject, responding to questions and issues of Data Subject	voluntary consent or fulfilling legal obligation or based on agreement or justified interest or legal obligation or crucial interest	All natural persons including a representative acting on behalf of an organisation who – apart from a one-off request for information also conduct continuous or regular liaising with Data Controller	for details please refer to the information/description of data processing	until the realisation of the objectives or a request for deletion or a deadline specified in the law or expiry of limitation period or until justified interests cease to exist	electronically and/or manually, on paper	Data Subjects

Summarising table of data procession in the course of Data Subject requesting for and Data Controller giving a price quotation						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to give a price quotation acceptable for Data Subject, liaising	voluntary consent	All natural persons including a representative acting on behalf of an organisation who request a price quotation from Data Controller and	for details please refer to the information/description of data processing	with the period of validity, if accepted, until the legal relationship ceases to exist, if based on justified interest, then until the cessation of	electronically and/or manually, on paper, typically electronically, manually	Data Subjects

		give their personal data		existence of that interest		
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Summarising table of data procession related to calls for price quotation and submitted price quotations						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to submit a quotation upon request by Data Controller, liaising	voluntary consent, the justified interest of Data Controller, or fulfilment of legal obligation	for details please refer to the information/description of data processing	for details please refer to the information/description of data processing	8 years, if accepted, if unaccepted, in the period of validity, or at a deadline defined by law or application form	electronically and/or manually, on paper	Data Subjects

Summarising table of data procession related to entering into agreement						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to conclude and fulfil the agreement, to monitor the fulfilment, liaising	Entering into an agreement (GDPR agreement article 6. 1. b.) the procession of the data of the representative, contact person is based on justified interests	All natural persons and a natural person acting on behalf of an organisation who supply their own data and are included in the contract as representatives or contact persons.	for details please refer to the information/description of data processing	limitation period or period of time defined in the agreement or may not be scrapped, therefore may not be deleted	electronically and/or manually, on paper	Data Subjects

Summarising table of data procession related to time arrangements and appointments						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to provide an appointment for Data Subjects, liaising	based on voluntary consent	All natural persons and a natural person acting on behalf of an organisation who supply their own data and book or arrange a time and date of service.	for details please refer to the information/description of data processing	until the objective is met or in the general period of limitation or as long as the justified interest exists	electronically and/or manually, on paper	Data Subjects

Summarising table of data procession related to declarations of consent						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to make the legal ground of data procession	voluntary consent	All natural persons who give a consent to Data	for details please refer to the	until withdrawal of consent/deletion	electronically and/or	Data Subjects

provable, the fulfilment of consent, liaising		Controller for any reason.	information/description of data processing.	declaration of consent is deleted following the expiry of the limitation period following withdrawal	manually, on paper	
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Summarising table of data procession related to the agreement of Data Subject to making pictures, video and audio recordings						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
an objective defined in the consent of Data Subject	voluntary consent	All natural persons who give their prior consent to be recorded in an audio or video recorder.	for details please refer to the information/description of data processing.	upon the request of Data Subject, until deletion	electronically and/or manually, on paper	Data Subjects

Summarising table of data procession related to complaints and complaints procession						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to identify the Data Subject and the complaint, the procession of the complaint and liaising	it is initiated by voluntary consent, however, in accordance with GDPR article 6, data procession is essential in order to have the legal obligations of Data Controlled fulfilled, in accordance with Act CLV of 1997, section 17/A (7) on the Protection of consumer rights	All natural persons who make a complaint with reference to service, purchased product or conduct or activities of Data Controller.	for details please refer to the information/description of data processing	in accordance with the Act on Consumer protection, Data Controller retains the protocol taken of the complaint the the copy of the response sheet thereof for five years	electronically and/or manually, on paper	Data Subjects

Summarising table of data procession related to records of Data Subjects (partners and customers)						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to identify Data Subjects, liaising, follow up of on observing the agreement (if relevant)	based on voluntary consent or based on agreement or necessary for fulfilling legal obligations or based on	All natural persons who wish to be an employee and representatives or non-natural persons who is or wish to be a partner, customer or employee of Data Controller.	for details please refer to the information/description of data processing	upon the request by Data Subject, until deletion until deletion due to failure of checking data accuracy, until deletion due to the death of Data Subject	electronically and/or manually, on paper	Data Subjects, or partners

	justified interest			<p>if necessitated by the interests of Data Controller then until the cessation of the existence of the interest</p> <p>Data Controller may declare the records to be of lasting value , therefore the data therein may not be deleted</p>		
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Summarising table of data procession related to declarations of liability						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to have the Data Subjects, make their declaration, to identify Data Subjects and (if need be) (if the conditions in the declaration of liability are not met) to make contact and to liaise	based on the justified interest of Data Controller, and it is the condition of using the service.	All natural persons who make a declaration of liability with Data Controller.	for details please refer to the information/description of data processing	six month, but not longer than the limitation period	electronically and/or manually, on paper, typically electronically, manually	Data Subjects

Summarising table of data procession related to transferring data (to third parties)						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
unique objective	consent, fulfilment of legal obligations, agreement, justified interest	All natural persons including a natural person acting on behalf of an organisation whose data are transferred to a third party by Data Controller.	for details please refer to the information/description of data processing	until the objective is met or the expiry of limitation period or deadline defined by law, or the cessation of existence of justified interest	Electronically and/or manually, observing the requirements of data security and principles of confidentiality	Data Subjects, data processor, certified public records

Summarising table of data procession related to protocols of hand over-take over						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
proving, follow up	justified interest of Data Controller or fulfilment of legal obligations, if requested by law.	All natural persons and representatives of non-natural persons who receives products/goods etc. from Data Controller or give them to Data Controller, and	for details please refer to the information/description of data processing.	limitation period, or until the cessation of the existence of justified interest	Electronically, on paper, manually	Data Subjects

		their witnesses, if need be.				
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Summarising table of data procession related to table booking						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to book a table, to identify Data Subjects, liaising	based on voluntary consent	All natural persons who booked a table with supplying their personal data.	for details please refer to the information/description of data processing	until the objective is met	electronically and/or on paper, manually	Data Subjects

Summarising table of data procession related to entering competitions						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to identify Data Subjects, to check the conditions of participation in competitions, liaising	agreement possible justified interest	All natural persons who, with supplying their personal data, wish to enter a competition organised by Data Controller.	for details please refer to the information/description of data processing	until the expiry of limitation period, or at least for 8 years in accordance with section 2 of Act C of 2000	electronically and/or on paper, manually	Data Subjects

Summarising table of data procession related to medical condition						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to provide appropriate services to Data Subject, liaising	voluntary consent	All natural persons who share their medical data with Data Controller.	for details please refer to the information/description of data processing	primarily until the objective is met or until withdrawal, but no longer than the period of limitation	electronically on paper, manually	Data Subjects

Summarising table of data procession related to bank details, bank transfers						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
To facilitate and monitor the fulfilment of financial obligations	the fulfilment of legal obligations and/or agreement or voluntary consent	All natural persons to whom transfer of money performed, initiated by Data Controller, all natural persons who wish to fulfil their financial duties to Data Controller via bank transfer.	for details please refer to the information/description of data processing.	until limitation or and an expiry date defined by law	electronically, manually or automated	own records, Data Subjects

Summarising table of data procession related to issuing invoices						
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Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to fulfil legal obligations	fulfilment of legal obligations in accordance with Act CXXVII of 2007 on VAT and all decrees based of the act above	All natural persons, including self-employed people, whose data may be displayed in any part or section of an invoice or an equivalent accounting document issued by Data Controller.	data categories defined in Act CXXXVII of 2007 Sections 169 to 170 and section 176	8 years	electronically and/or on paper, manually	Data Subjects, occasionally certified public records

Summarising table of data procession related to accepting invoices						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
complete fulfilment of legal obligations, the storage of invoice or an equivalent accounting document based on Act CXXVII of 2007 section 179	fulfilling legal obligations (Act CXXVII of 2007 section 179)	All natural persons whose data are displayed on an invoice or an equivalent accounting document or the annexes thereof.	data categories defined in Act CXXXVII of 2007 Sections 169 to 170 and section 176	8 years	electronically and/or on paper, manually	party issuing invoice

Summarising table of data procession related to operating a CCTV system						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
Objectives defined in the Camera regulations, e.g. property protection, personal safety, etc., identification of Data Subjects.	justified interest of Data Controller	All natural persons who enter or stay in an area monitored by CCTV system.	please refer to the information on data procession	8 days from recording	electronically, automated	Data Subjects

Summarising table of data procession related to placing orders through the website						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to order services of Data Controller, liaising	based on entering into agreement (GDPR article 6 (1) b)	All natural persons, who, with supplying their data, order through Data Controller's website Data Controller's services described on the website.	please refer to the information on data procession	please refer to the information on data procession	please refer to the information on data procession	directly from Data Subjects

Summarising table of data procession related to sending out newsletters						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to send the addressee full scale, general or tailor made information on the latest sales campaigns, events and news of Data Controller	based on voluntary consent	All natural persons who wish to be regularly informed of news, sales campaigns and discounts, therefore by submitting their personal data they subscribe to the newsletter of Data Controller.	please refer to the information on data procession	until unsubscription	subscription is performed electronically or on paper, manually sending electronically, automatically unsubscription is performed electronically or on paper, manually	Data Subjects

Summarising table of data procession related to organising prize games						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to make participation possible, to identify Data Subjects in the course of the draw, liaising	voluntary consent	All natural persons who submit their data to take part in the prize games organised by Data Controller.	please refer to the information on data procession	until the objective is met or period of limitation	registration is performed electronically/on paper, manually the draw is automated or manual (depending on the type of the draw)	Data Subjects

Summarising table of data procession related to event organising						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to perform tasks related to event organising, liaising with Data Subjects	based on voluntary consent, or on agreement or justified interest	All natural persons who take part in an event, use services of event organisation.	please refer to the information on data procession	period of limitation	electronically and/or on paper, manually	Data Subjects

Summarising table of data procession related to surveying customer satisfaction						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to enhance the of conduct and quality of Data Controller, examining possible complaints, liaising	justified interest of Data Controller	All natural persons, as part of the quality assurance process of Data Controller, take part in a customer satisfaction survey.	please refer to the information on data procession	Until the objective is met, in case of a complaint, for the duration of 5 years	electronically and/or on paper, manually	own records of Data Subjects

Summarising table of data procession related to marketing conducted on social media pages						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
the marketing of Data Controller	Voluntary consent	All natural persons, who voluntarily follow, share or like the social media pages (or their contents) of Data Controller.	please refer to the information on data procession	Until deletion on Data Subject's request or the cessation of justified interest	electronically, manually	Data Subjects

Summarising table of data procession related to the procession of the data of job applicants						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
to facilitate the processes of application and selection, liaising	Voluntary consent	All natural persons who apply for a job advertisement published by Data Controller or apply for employment with Data Controller without a job advertisement.	please refer to the information on data procession	period defined in the consent or the cessation of justified interest	electronically and/or on paper, manually	Data Subjects

Summarising table of data procession related to orders placed with data processors						
Objective	Legal ground	Data Subjects	Category of data	Duration	Method	Source
placing an order and liaising	agreement, the procession of the data of the contact person is based on justified interest	All natural persons who order a product (service) from Data Controller	Please refer to the information/description of data procession	Until refusal or time limitation or expiry of limitation period	electronically and/or paper, procession is performed manually	Data Subjects