

DATA MANAGEMENT GUIDE

1. PURPOSE OF THE DATA PROCESSING INFORMATION

Békesziwood Kft. (Address: 2092 Budakeszi, Úrbéres u. 16 / B, hereinafter: service provider, data controller), as a data controller, acknowledges the content of this legal notice as binding on it. It undertakes that all data processing related to its activities complies with the requirements set out in these regulations and in the applicable national legislation, as well as in the legal act of the European Union.

This privacy statement covers the following domain:

danieltrapp.net

The data protection guidelines arising in connection with the data controller's data management are continuously available at danieltrapp.net/datamanagementguide.

The Data Controller reserves the right to amend this prospectus at any time. Stakeholders will be informed of the changes in due time.

If you have any questions regarding this notice, please write and we will answer your questions.

The data controller is committed to the protection of the personal data of its customers and partners, and considers it extremely important to respect the right of its customers to information self-determination. The data controller shall treat the personal data confidentially and shall take all security, technical and organizational measures that guarantee the security of the data.

The data controller describes his data management practices below.

2. DATA CONTROLLER INFORMATION

Trapp Dániel E.V.

Headquarters: 2040 Budaörs, Szép str. 20.

Electronic mail address: danieltrp@gmail.com

Registration number: 53745262

Tax number: 69828524133

2.1 DATA PROCESSOR DATA

Company name: **Batori Group**

Headquarters: **Hungary, 6000, Kecskemet, Irinyi utca 38.**

Tax number: **28756886-2-13**

3. RANGE OF PERSONAL DATA PROCESSED

3.1. TECHNICAL DETAILS

The data controller selects and operates the IT tools used to manage personal data during the provision of the service in such a way that the managed data:

accessible to those entitled to it (availability);

authenticity and authentication are ensured (authenticity of data management);

its invariability can be justified (data integrity);

be protected against unauthorized access (data confidentiality).

The controller shall take appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction.

The data controller shall ensure the protection of the security of data processing by technical,

organizational and organizational measures that provide a level of protection appropriate to the risks associated with the data processing.

The data controller maintains confidentiality during data management: it protects the information so that only those who have the right to access it can access it; integrity: protects the accuracy and completeness of the information and the method of processing; availability: ensures that when an authorized user needs it, they can actually access the information they want and have the tools to do so.

3.2. COOKIES

3.2.1. THE TASK OF THE COOKER

Cookies collect information about visitors and their assets; remember the individual settings of the visitors, which can be used e.g. when using online transactions so you don't have to re-type them; facilitate the use of the website; they provide a quality user experience and participate in the collection of some visitor statistics.

In order to provide customized service, a small data packet, the so-called places a cookie and reads it back at a later visit. If the browser returns a previously saved cookie, the cookie provider has the option to link the user's current visit to the previous ones, but only for their own content.

Some cookies do not contain personally identifiable information about the individual user, some contain a secret, randomly generated sequence of numbers that is stored by the user's device and ensures the user's identity.

3.2.2. ABSOLUTELY REQUIRED, SESSION COOKIES

The purpose of these cookies is for visitors to fully and seamlessly browse the danieltrapp.net website, use its functions and the services available there. These types of cookies last until the end of the session (browsing), and when you close the browser, these types of cookies are automatically deleted from your computer or other device used for browsing.

3.2.3. THIRD PARTY COOKIES (ANALYSIS)

The danieltrapp.net website also uses Google Analytics as a third-party cookie. Using the Google Analytics statistical service, the danieltrapp.net website collects information about how visitors use the website. Use the data to improve the website and improve the user experience. These cookies also remain on the visitor's computer or other device used for browsing, in its browser, or until the visitor deletes them until they expire.

3.2.4. LEGAL BASIS FOR COOKIE TREATMENT

The legal basis for the handling of cookies is the consent of the website visitor, in accordance with Article 6 (1) (a) of the relevant Regulation.

If you do not accept the use of cookies, certain functions of the website will not be available during your use, or certain functions may not work properly.

For more information on deleting cookies for more common browsers, see the following links:

Firefox: Delete cookies placed by websites from your computer

Chrome: Clear cache & cookies

Safari: Manage cookies and website data in Safari on Mac

3.2.5. LIST OF COOKIES ON THE WEBSITE

4. GENERAL DATA PROCESSING POLICIES, NAME, USE, LEGAL BASIS AND RETENTION PERIOD

The data management of the data controller's activity is based on voluntary consent or legal authorization. In the case of data processing based on voluntary consent, data subjects may withdraw their consent at any stage of the data processing.

In some cases, the handling, storage and transmission of a set of provided data is required by law, of which we notify our customers separately. We would like to draw the attention of informants to the Data Controller that if they do not provide their own personal data, the informant is obliged to obtain the consent of the data subject. Its data management principles are in line with existing data protection legislation, in particular:

2011 CXII. Act on the Right to Information Self-Determination and Freedom of Information (Infotv.); Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46 (General Data Protection Regulation, GDPR); Act V of 2013 - on the Civil Code (Civil Code); Act C of 2000 - on Accounting (Act on Accounting); 2017 LIII. Act on the Prevention and Suppression of Money Laundering and Terrorist Financing (Pmt.); 2013 CCXXXVII. Act - on Credit Institutions and Financial Enterprises (Hpt.). The data maps of the data controller were prepared, on the basis of which the scope of the processed data, their use, legal basis and retention period were determined.

4.1. INFORMATION RELATED TO ONLINE ADMINISTRATION

Personal information requested during the contact:

name
e-mail address
phone number

Purpose of data management, planned use of the managed data: The data will be used for contact and fulfillment of the order.

The legal basis for data management is voluntary consent.

Retention period: the duration of a business relationship or a cancellation request.

4.2. CUSTOMER CONTACT DETAILS

The data controller stores the following personal data and contact details of the clients' company managers and contacts:

name
e-mail address
phone number

Purpose of data management, intended use of the managed data: The data is used for contact and communication purposes.

The legal basis for data management is a legitimate interest.

Retention period: the duration of a business relationship or a cancellation request.

4.3. INVOICING INFORMATION

The data controller enters into a contract with its customers for the ordered services, during which it

stores the following data:

name

title

phone number

The purpose of data management, the intended use of the managed data: invoicing.

Legal basis for data management: legal requirement.

Retention period: according to legal regulations, current year + 5 years

4.4. MANAGEMENT OF CONSUMER PROTECTION COMPLAINTS

If you submit a consumer protection complaint, data management and the provision of data are essential for the administration.

name

e-mail address

phone number

The purpose of data management, the intended use of the processed data: administration of consumer protection complaints.

The legal basis for data management is voluntary consent.

Retention period: subject year + 5 years according to the Consumer Protection Act

5. PHYSICAL STORAGE OF DATA

Your personal information (that is, information that may be associated with you) may be processed by us in the following ways:

on the one hand, in connection with the maintenance of the Internet connection, the technical data related to the computer, browser program, Internet address and pages visited by you are automatically generated in our computer system,

on the other hand, you may also provide your name, contact information or other details if you make a personal connection while using the Website

6. TRANSFER OF DATA TO A THIRD COUNTRY

The data will be transferred to the United States, with which a decision on compliance was taken on 12 July 2016 (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en).

The compliance decision also applies to data controllers from Google (<https://policies.google.com/privacy/frameworks>) and Facebook (<https://www.facebook.com/about/privacyshield>).

7. RIGHTS OF THE PERSON CONCERNED AND POSSIBILITIES OF ENFORCEMENT

The data subject may request information on the handling of his / her personal data, as well as request the correction or deletion, revocation of his / her personal data, except for mandatory data processing, exercise his / her right to carry data and protest in the manner indicated at the time of data collection.

7.1. RIGHT TO INFORMATION

The controller shall take appropriate measures to provide the data subject with all information

concerning the processing of personal data referred to in Articles 13 and 14 of the GDPR and Articles 15 to 22. and Article 34 shall be provided in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner.

7.2. RIGHT OF ACCESS TO THE PERSON CONCERNED

The data subject shall have the right to receive feedback from the controller as to whether the processing of his or her personal data is in progress and, if such processing is in progress, shall have the right to access the personal data and the following information:

- the purposes of data management;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be communicated, including in particular:
 - third country recipients and international organizations;
- the intended duration of the storage of personal data;
- the right to rectify, erase or restrict data processing and to protest;
- the right to lodge a complaint with the supervisory authority;
- information on data sources;
- the fact of automated decision-making, including profiling, and comprehensible information on the logic used and the significance of such data management and the expected consequences for the data subject.

The controller shall provide the information no later than one month after the submission of the request.

7.3. RIGHT OF CORRECTION

The data subject may request the correction of inaccurate personal data processed by the Data Controller and the addition of incomplete data.

7.4. RIGHT OF CANCELLATION

The data subject shall have the right, at the request of the Data Controller, to delete personal data concerning him or her without undue delay if one of the following reasons exists:

- personal data are no longer required for the purpose for which they were collected or otherwise processed;
- the data subject withdraws his or her consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there is no overriding legitimate reason for the processing;
- personal data have been processed unlawfully;
- personal data must be deleted in order to fulfill a legal obligation under Union or Member State law applicable to the controller;
- personal data were collected in connection with the recommendation of information society services.

Deletion of data cannot be initiated if data management is required:

- for the purpose of exercising the right to freedom of expression and information;
- for the purpose of fulfilling an obligation under Union or Member State law governing the processing of personal data or performing a task carried out in the public interest or in the exercise of official authority vested in the controller;

in the field of public health, or for archival, scientific and historical research or statistical purposes, in the public interest;
or to bring, assert or defend legal claims.

7.5. RIGHT TO RESTRICT DATA PROCESSING

At the request of the data subject, the Data Controller shall restrict the data processing if one of the following conditions is met:

the data subject disputes the accuracy of the personal data, in which case the restriction shall apply for a period which allows the accuracy of the personal data to be verified;

the processing is unlawful and the data subject opposes the deletion of the data and instead requests that their use be restricted;

the controller no longer needs the personal data for the purpose of data processing, but the data subject requests them in order to make, enforce or protect legal claims;

or the data subject has objected to the processing;

in that case, the restriction shall apply for as long as it is established whether the legitimate reasons of the controller take precedence over the legitimate reasons of the data subject.

Where processing is restricted, personal data may be processed, with the exception of storage, only with the consent of the data subject or for the purpose of bringing, enforcing or protecting legal claims, protecting the rights of another natural or legal person or in the important public interest of the Union or a Member State.

7.6. RIGHT TO DATA CARRIER

The data subject shall have the right to receive personal data concerning him or her made available to the controller in a structured, widely used, machine-readable format and to transmit such data to another controller.

7.7. RIGHT OF PROTECTION

The data subject shall have the right to object at any time, for reasons related to his / her situation, to the processing of personal data in the public interest or in the exercise of public authority or to the processing of data controllers or third parties, including profiling based on those provisions. is. In the event of an objection, the controller may not further process the personal data, unless justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the data subject or which relate to the submission, enforcement or protection of legal claims.

7.8. AUTOMATED DECISION-MAKING IN INDIVIDUAL CASES, INCLUDING PROFILING

The data subject shall have the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effects on him or her or would be similarly significant.

7.9. RIGHT OF WITHDRAWAL

The data subject has the right to withdraw his or her consent at any time.

7.10. RIGHT TO GO TO COURT

In the event of a breach of his rights, the data subject may take legal action against the data controller. The court is acting out of turn in the case. 8.11 Data protection authority procedure A complaint can be lodged with the National Data Protection and Freedom of Information Authority:

Name: National Data Protection and Freedom of Information Authority

Headquarters: 1125 Budapest, Szilágyi Erzsébet avenue 22 / C.

Mailing address: 1530 Budapest, Pf .: 5.

Phone: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

8. OTHER PROVISIONS

Information on data processing not listed in this prospectus will be provided at the time of data collection. We inform our clients that the court, the prosecutor, the investigating authority, the infringement authority, the administrative authority, the National Data Protection and Freedom of Information Authority, the Magyar Nemzeti Bank, or other bodies are authorized to provide information, disclose data, transfer documents or documents. they may contact the controller to make it available. The controller shall provide personal data to the authorities, provided that the authority has indicated the exact purpose and scope of the data, only to the extent and to the extent strictly necessary for the purpose of the request.