

**DATA PROCESSING INFORMATION
on the rights of the guest
in terms of the processing of his/her
personal data**

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INTRODUCTION

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as: Regulation) provides that the data controller shall take appropriate measures to provide any communication relating to processing to the data subject on the processing of his or her personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language, as well as that the data controller shall facilitate the exercise of data subject rights.

The obligation of the preliminary information of the data subject is also stipulated by Act CXII of 2011, on Informational Self-determination and Freedom of Information.

By the information below we intend to fulfil those statutory obligations.

This information must be published on the website of the Company or, upon request, must be forwarded to the data subject.

CHAPTER I: IDENTIFICATION OF THE DATA CONTROLLER

The issuer of this Information, as well as the Data Controller is:

Company name:	Full Moon Budapest Ltd.
Registered seat:	H-1055 Budapest, Szent István krt. 11.
Registration authority, registration number:	Company Registration Court of the Metropolitan Court, 01-09-184541
Tax registration number:	24827421-2-41
Represented by / CEO:	Szandra Glózik
Phone number:	+36-1-792-9045
Website:	www.fullmoonbudapest.com

hereinafter referred to as: the Company.

CHAPTER II: IDENTIFICATION OF THE DATA PROCESSORS

'Data processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller (Regulation, Article 4 (8)).

The use of a data processor does not require the prior consent of the data subject, however, he or she must be informed thereof. Accordingly, we give the following information:

IT and CCTV service provider of our Company

For the maintaining and managing of its website our Company uses a data processor who provides IT services (web storage), and in the framework of that, during the term of our contract, it processes the personal data given through our website. The operation carried out by it is the storage of personal data on the server.

The identification of this data processor is the following:

Company name:	Marginus Kft.
Registered seat:	H-6728 Szeged, Hídverő utca 4/A
Registration authority, registration number:	Company Registration Court of the Szeged Court, 06-09-013337
Tax registration number:	14565320-2-06
Represented by / CEO:	Zoltán Nagy
Phone number:	

Accounting service provider of our Company

For the fulfilment of its taxation and accounting obligations, on the basis of an accounting service contract, our Company uses an external service provider who, among others, processes the personal data of natural persons who get in contractual or payment relationship with our Company, for the purpose of the fulfilment of taxation and accounting obligations of our Company.

The identification of this data processor is the following:

Company name:	ITC 91 Ltd.
Registered seat:	H-1188 Budapest, Zrínyi u. 30/B.
Registration authority, registration number:	Company Registration Court of the Metropolitan Court, 01-09-710282
Tax registration number:	12925364-2-43
Represented by / CEO:	Tamás Katona
Phone number:	

Legal service provider of our Company

For the fulfilment of its taxation and accounting obligations, on the basis of a legal service contract, our Company uses an external service provider who, among others, processes the personal data of natural persons who get in contractual or payment relationship with our Company, for the purpose of the fulfilment of legal obligations of our Company.

The identification of this data processor is the following:

Company name:	Dr. Varga Kata Law Office
Registered seat:	H-1055 Budapest, Szent István krt. 11. 4/4.
Registration authority, registration number:	Hungarian Bar Association, KASZ: 36071029
Tax registration number:	18135918-2-41
Represented by / CEO:	Dr. Kata Varga
Phone number:	+36-30-572-2220

Property protection service provider of our Company

On the basis of an assignment by our Company, during the term of our contract, this data processor performs the camera surveillance of our workplaces, manages entry and access systems and performs data processing in relation to those activities.

The identification of this data processor is the following:

Company name:	Marginus Kft.
Registered seat:	H-6728 Szeged, Hídverő utca 4/A
Registration authority, registration number:	Company Registration Court of the Szeged Court, 06-09-013337
Tax registration number:	14565320-2-06
Represented by / CEO:	Zoltán Nagy
Phone number:	

CHAPTER III: DATA PROCESSING CONNECTED TO CONTRACTS

Processing of contracting partners' data – registration of buyers and suppliers

For the performance of the contract as a legal title, for the purpose of the conclusion, fulfilment or termination of the contract or for the provision of contractual discounts, the Company processes the data relating to the name, birth name, date of birth, mother's maiden name, address, tax identification number, tax registration number, entrepreneur's or farmer certificate number, ID number, registered seat, registered office, phone number, e-mail address, website url, bank account number, buyer code (customer code, order code), online account ID (buyers', suppliers', vip buyers' lists) of natural persons entering into a contractual relationship with the Company as a buyer or supplier. This data processing is also lawful if the data processing takes place prior to the conclusion of the contract in the course of actions taken upon the request of the data subject.

Recipients of the personal data: the employees and data processors of the Company performing tasks connected to customer service, accounting and taxation, according those described above.

Term of storage of personal data: 5 years from the termination of the contract.

Prior to the commencement of data processing the natural person data subject must be informed, that the legal title of the processing of data is the performance of the contract, which information can be given in the contract. The data subject must be informed of the transfer of his/her personal data to the data processor.

Correspondence data of natural person representatives of legal person customers, buyers and suppliers

Sphere of personal data that can be processed: name, address, phone number, e-mail address, online account ID of the natural person.

Purpose of processing of personal data: performing of the contract concluded with the legal person partner of the Company, business correspondence; legal title: the consent of the data subject.

Recipients of the personal data, recipient categories: the employees of the Company performing tasks connected to customer service.

Term of storage of personal data: 5 years from the termination of the business relationship or of the representative status of the data subject.

Processing of data of the visitors of the Company website, Information on the use of cookies

Cookies are short data files which are placed onto the computer of the user by the website visited. The purpose of the cookie is to facilitate and make more comfortable the info communication internet service concerned. It has several types, generally two main groups. On of them are the temporary cookies which are placed by the website onto the device of the user only in the course of a certain work procedure (e.g. during the security

identification of an internet banking procedure), while the other group are the permanent cookies (e.g. the language settings of a website), which remain on the computer until they are deleted by the user. On the basis of the directives of the European Commission cookies can only be placed onto the devices of a user upon the permission of the user [except if they are crucial in terms of the use of the service concerned].

In case of cookies that do not require the permission of the user information must be given thereof at the time of the first visit of the website. It is not necessary to display the whole text of the information on the website, it's enough to briefly summarize the information and refer to the full text of the information by a link.

In case of cookies that require the permission of the user, the information can also be given at the first visit of the website in case if the data processing corresponding to the use of cookies is commenced by the visiting of the website. If the use of cookies is only connected to the use of certain functions expressly requested by the user, then it is enough to display the information at the time of use of such functions. In this latter case it is also not necessary to display the whole text of the information on the website, it's enough to briefly summarize the information and refer to the full text of the information by a link.

According to the general practice on the Internet, our Company also uses cookies on its website. A cookie is a small file containing a series of characters which is placed onto the computer of the user at the time of visiting a website. When visiting that website again, thanks to cookies, the website will be able to recognise the browser of the user. Cookies may store visitor settings (e.g. language settings) and other pieces of information. For example they collect information on the user and its devices, remember the personal settings of the visitor, they can be used e.g. at the time of use of online shopping carts. Generally, cookies ease the use of a website, facilitate the provision of a real web experience for the users and the use of the website as an effective source of information, furthermore they provide control over the operation of the website for the operator, enable the elimination of misuse and the provision of services in an undisturbed manner at a sufficient level of quality.

During its use our Company website records and processes the following data on the visitor and the device used for browsing:

- the IP address used by the visitor,
- the type of the browser,
- features of the operation system of the device used for browsing (language settings),
- time of visiting,
- (sub)pages, function or service visited.

The acceptance, permission of the use of cookies is not obligatory. The user can reset the settings of his/her browser to reject all cookies or to notify the user if the system is sending a cookie. Most browsers automatically accepts cookies as a default setting, these settings however can usually be changed in order to avoid automatic acceptance and to have the option to accept offered each time.

Information on the cookie settings of the most popular browsers is available at the following links:

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>
- Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>
- Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>
- Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>
- Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>
- Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>
- Safari: <https://support.apple.com/hu-hu/HT201265>

At the same time we call your attention that it may occur that certain website functions or services will not properly operate without cookies.

Cookies alone used on the website are not capable of the identification of the person of the user.

Cookies used on the Company website

Technically crucial workflow (session) cookies

These cookies are necessary to enable the visitors to browse the website, to flawlessly and wholly use its functions and the services available through the website, especially the recording/remembering of the actions taken by the user in the course of a visit on a certain site. The term of processing of data contained in such cookies are limited to the actual visit of the user, after the workflow session and by the closing of the browser these type of cookies are automatically deleted from the computer of the user.

The scope of data processed:

The legal title of the processing of this kind of data processing is Section 13/A. § (3) of Act CVIII of 2001 on certain issues concerning electronic trade services and information society services (Elkertv.)

The purpose of data processing: provision of the proper functioning of the website.

Cookies requiring acceptance

These types of cookies enable the Company to record/remember the choices of the user in terms of the use of the website. The visitor is entitled to prohibit that kind of data processing any time prior to or in the course of the use of the service concerned. These data cannot be connected with the identification data of the user and cannot be handed over to a third person without the consent of the user.

Cookies facilitating the use of the website

The legal title of data processing is the consent of the visitor.

Purpose of data processing: enhancing the efficiency of the service, the user experience and making the use of the website more comfortable.

Term of data processing: 6 months.

Cookies providing performance

Google Analytics cookies – more information is available at:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Google AdWords cookies - more information is available at:

<https://support.google.com/adwords/answer/2407785?hl=hu>

Registration on the Company website

The natural person signing up on the Company website can give his/her consent to the processing of his/her personal data by checking the relevant checkbox. Default setting of the checkbox as checked is prohibited.

Scope of personal data that can be processed: name (first name, family name), address, phone number, e-mail address, online identification code of the natural person.

Purpose of processing of personal data:

- performing of services provided on the website,
- correspondence via electronic, phone, SMS and postal reach,
- information on the products, services, contractual terms, discounts of the Company,
- advertising material can be sent in the course of such communication via electronic and/or postal means,
- analysis of the use of the website.

The legal title of data processing is the consent of the data subject.

Recipients of the personal data, recipient categories: the employees of the Company performing tasks connected to customer service, marketing activities, and the employees performing web storage services of the IT service provider of the Company, as a data processor.

Term of storage of personal data: during the existence of registration/service or until the withdrawal of the consent of the data subject (deletion request).

Data processing connected to newsletter service

The natural person subscribing to the Company newsletter service can give his/her consent to the processing of his/her personal data by checking the relevant checkbox. Default setting of the checkbox as checked is prohibited. The data subject can unsubscribe any time from the newsletter by using the 'Unsubscribe' function of the newsletter, or by means of a written or e-mail representation, which will be deemed as the withdrawal of consent. In such cases all data of the unsubscribing person must be deleted immediately.

Scope of personal data that can be processed: name (first name, family name), e-mail address of the natural person.

Purpose of the processing of personal data:

- sending of newsletter on the products, services of the Company,
- sending of advertising materials.

Legal title of data processing: consent of the data subject.

Recipients of the personal data, recipient categories: the employees of the Company performing tasks connected to customer service, marketing activities, and the employees performing web storage services of the IT service provider of the Company, as a data processor, for the purpose of performing web storage services.

Term of storage of personal data: during the existence of the newsletter service or until the withdrawal of the consent of the data subject (deletion request).

Community guidelines / data processing on the Company social media site

For the purpose of communication and promotion of its products and services the Company operates a Facebook page.

A query sent through the Facebook page of the Company will not qualify as a complaint officially submitted.

The personal data published by the visitors on the Facebook page of the Company will not be processed by the Company.

The Terms of Data Protection and Service of Facebook will apply on visitors.

In case of publishing unlawful or insulting content the Company will be entitled to exclude the person concerned from the members and/or to delete its comment.

The Company will not be responsible for the data content and comments violating legal rules published by Facebook users. The Company will not be responsible for any defaults or system errors caused by the operation of Facebook, or for any issues caused by the changing of the operation of the system.

Data processing connected to the organising of prize draws

If the Company organises a prize draw (Section 23 of Act XXXIV of 1991), it will be entitled to process the name, address, phone number, e-mail address and online identification number of the natural person on the basis of his/her consent.

Purpose of processing of personal data: identification and notification of the winner of the prize draw, sending of the prize. Legal title of data processing: consent of the data subject.

Recipients of the personal data, recipient categories: the employees of the Company performing tasks connected to customer service and the employees performing web storage services of the IT service provider of the Company, as a data processor, employees of the courier services.

Term of storage of personal data: until the final financial settlement of the prize draw.

Data processing for direct marketing purposes

Unless special legal rules otherwise provide, advertisements by the method of direct reach (direct business acquisition), especially through electronic mails or any other equivalent means of personal communication, with the exception defined in Act XLVIII of 2008, can only be communicated to natural persons as the recipients of the advertisement, if the recipient of the advertisement has given his/her preliminary, obvious and expressed consent to it.

The scope of personal data that can be processed by the Company for the purpose of direct reach of advertisement recipients: name, address, phone number, e-mail address, online identification number of the natural person.

The purpose of the processing of the personal data: pursuing of direct marketing activities connected to the activities of the Company, which means the regular or periodic delivery of advertisement materials, newsletters, actual offers in a printed (postal) or electronic (e-mail) form to the addresses given at the time of registration.

Legal title of the data processing: consent of the data subject.

Recipients of the personal data, recipient categories: the employees of the Company performing tasks connected to customer service, the employees performing web storage services of the IT service provider of the Company, as a data processor, employees of the post office in case of postal delivery.

Term of storage of personal data: until the withdrawal of consent.

CHAPTER IV: DATA PROCESSING BASED ON LEGAL OBLIGATIONS

Data processing for the purpose of the fulfilment of taxation and accounting obligations

Under the legal title of the fulfilment of legal obligations, for the purpose of performing taxation and accounting requirements prescribed by the legal rules, the Company processes the data defined in the legal rules of the natural persons entering into a business relationship with the Company as buyers or suppliers. On the basis of Sections 169 and 202 of Act CXXVII of 2017 on the value added tax, the data processed are, in particular, but not limited to, the following: tax number, name, address, taxation status, on the basis of Section 167 of Act C of 2000 on accounting: name, address, indication of the person or organisation ordering the business operation, the signature of the consignor and of the person justifying the implementation of the order, and, depending on the organisation, of the supervisor, signature of recipient on the bills of asset movements and money handling, and of the payer on the counter-bills, on the basis of Act CXVII of 1995 on personal income tax: the identification number of entrepreneur's ID and of farmer's ID, tax identification figure.

Term of storage of the personal data: 8 years from the termination of the legal relationship forming the legal basis.

Recipients of the personal data: employees and data processors of the Company performing tasks connected to taxation, accounting, payroll, social security, according to those described above.

Data processing in relation to historic documents on the basis of the Archiving Act

Under the legal title of the fulfilment of legal obligations, the Company handles its documents qualifying as historic documents on the basis of Act LXVI of 1995 on national documents, national archives and on the protection of materials of private archives (Archiving Act), in order to preserve the part of the documents stored in the Company archives that incorporate long-term values in its integrity and usable state for the future generations. Term of data storage: until handover to the national archives.

For the recipients of the personal data and for other issues of data processing the provisions of the Archiving Act will prevail.

Data processing for the purpose of the fulfilment of obligatory actions against money laundering

Under the legal title of the fulfilment of legal obligations, for the purpose of the prevention and combating of money laundering and terrorist financing, the Company processes the data of its customers, their representatives and actual owners, which data are defined in Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.) in case of natural persons: family and given name, birth family and given name, citizenship/nationality, place and date of birth, mother's maiden name, address, if not available: temporary address, type and number of identification document, number of authority certificate justifying address, and the copy of the documents shown (Article 7).

Recipients of the personal data: employees of the Company performing tasks connected to customer service, the CEO of the Company and the person designated in accordance with Pmt.

Term of storage of data: 8 years from the termination of the business relationship or from the fulfilment of the transaction assignment (Article 56 (2) of Pmt.).

CHAPTER V: RIGHTS OF THE DATA SUBJECT

Right to preliminary information

The data subject shall have the right to obtain information on the facts and circumstances connected to the data processing prior to the commencement thereof. (Article 13-14 of the Regulation)

Information to be provided where personal data are collected from the data subject

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:
 - (a) the identity and the contact details of the controller and, where applicable, of the controller's representative;
 - (b) the contact details of the data protection officer, where applicable;
 - (c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - (d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;

- (e) the recipients or categories of recipients of the personal data, if any;
- (f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:

- (a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- (b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- (c) where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- (d) the right to lodge a complaint with a supervisory authority;
- (e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
- (f) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.

4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information. (Article 13 of the Regulation)

Information to be provided where personal data have not been obtained from the data subject

1. Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information:

- (a) the identity and the contact details of the controller and, where applicable, of the controller's representative;
- (b) the contact details of the data protection officer, where applicable;
- (c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- (d) the categories of personal data concerned;
- (e) the recipients or categories of recipients of the personal data, if any;
- (f) where applicable, that the controller intends to transfer personal data to a recipient in a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the

appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.

2. In addition to the information referred to in paragraph 1, the controller shall provide the data subject with the following information necessary to ensure fair and transparent processing in respect of the data subject:

- (a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- (b) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
- (c) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
- (d) where processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- (e) the right to lodge a complaint with a supervisory authority;
- (f) from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;
- (g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. The controller shall provide the information referred to in paragraphs 1 and 2:

- (a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
- (b) if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
- (c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

4. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.

5. Paragraphs 1 to 4 shall not apply where and insofar as:

- (a) the data subject already has the information;
- (b) the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;
- (c) obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests; or
- (d) where the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy. (Article 14 of the Regulation)

Right of access by the data subject

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (f) the right to lodge a complaint with a supervisory authority;
- (g) where the personal data are not collected from the data subject, any available information as to their source;
- (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others. (Article 15 of the Regulation)

Right to rectification

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. (Article 16 of the Regulation)

Right to erasure ('right to be forgotten')

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the 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.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (e) for the establishment, exercise or defence of legal claims. (Article 17 of the Regulation)

Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted. (Article 18 of the Regulation)

Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it. (Article 19 of the Regulation)

Right to data portability

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
- (b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others. (Article 20 of the Regulation)

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 which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest. (Article 21 of the Regulation)

Automated individual decision-making, including profiling

1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

2. Paragraph 1 shall not apply if the decision:

- (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- (b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- (c) is based on the data subject's explicit consent.

3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place. (Article 22 of the Regulation)

Restrictions

1. Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12 to 22 and Article 34, as well as Article 5 in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22, when such a restriction respects the essence of the fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to safeguard:

- (a) national security;
- (b) defence;
- (c) public security;
- (d) the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
- (e) other important objectives of general public interest of the Union or of a Member State, in particular an important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security;

- (f) the protection of judicial independence and judicial proceedings;
- (g) the prevention, investigation, detection and prosecution of breaches of ethics for regulated professions;
- (h) a monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in the cases referred to in points (a) to (e) and (g);
- (i) the protection of the data subject or the rights and freedoms of others;
- (j) the enforcement of civil law claims.

2. In particular, any legislative measure referred to in paragraph 1 shall contain specific provisions at least, where relevant, as to:

- (a) the purposes of the processing or categories of processing;
- (b) the categories of personal data;
- (c) the scope of the restrictions introduced;
- (d) the safeguards to prevent abuse or unlawful access or transfer;
- (e) the specification of the controller or categories of controllers;
- (f) the storage periods and the applicable safeguards taking into account the nature, scope and purposes of the processing or categories of processing;
- (g) the risks to the rights and freedoms of data subjects; and
- (h) the right of data subjects to be informed about the restriction, unless that may be prejudicial to the purpose of the restriction. (Article 23 of the Regulation)

Communication of a personal data breach to the data subject

1. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

2. The communication to the data subject referred to in paragraph 1 of this Article shall describe in clear and plain language the nature of the personal data breach and contain at least the information and measures referred to in points (b), (c) and (d) of Article 33(3).

3. The communication to the data subject referred to in paragraph 1 shall not be required if any of the following conditions are met:

- (a) the controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- (b) the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialise;
- (c) it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

4. If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred to in paragraph 3 are met. (Article 34 of the Regulation)

Right to lodge a complaint with a supervisory authority

1. Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.
2. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78. (Article 77 of the Regulation)

Right to an effective judicial remedy against a supervisory authority

1. Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.
2. Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent pursuant to Articles 55 and 56 does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged pursuant to Article 77.
3. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.
4. Where proceedings are brought against a decision of a supervisory authority which was preceded by an opinion or a decision of the Board in the consistency mechanism, the supervisory authority shall forward that opinion or decision to the court. (Article 78 of the Regulation)

Right to an effective judicial remedy against a controller or processor

1. Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Article 77, each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.
2. Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers. (Article 79 of the Regulation)

CHAPTER VI: SUBMISSION OF THE REQUEST OF THE DATA SUBJECT, ACTIONS OF THE DATA CONTROLLER

Our Company as the controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request.

That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Information provided by our Company as controller under Articles 13 and 14 and any communication and any actions taken under Articles 15 to 22 and 34 shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:

- a) charge a 10,000 HUF fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- b) refuse to act on the request.

The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where the controller has reasonable doubts concerning the identity of the natural person making the request, it may request the provision of additional information necessary to confirm the identity of the data subject.