

Trebag Intellectual Property- and Project Manager Ltd.

## PRIVACY STATEMENT

according to the European General Data Protection Regulation and Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act")

Trebag Intellectual Property- and Project Manager Ltd. (hereinafter: Data Controller) provides for the legally compliant, transparent and fair collection and use of data of natural persons as well as access to such data and their other control as regulated by the procedure defined by this Privacy Statement. As for data control, Data Controller hereby informs Interested Party about the data managed on Data Controller's Website as well as Data Controller's principles and practice regarding the control of personal data and the ways and options of exercising the rights of Interested Party.

### Data of Data Controller

Name: Trebag Intellectual Property- and Project Manager Ltd.  
Registered seat: Puskás Tivadar utca 6. Nagykovácsi, Hungary H-2094  
Tax number: *10243231-2-13*  
Company reg. no.: *13-09-075659*  
Court of Registry: *Fővárosi Cégbírószág (Budapest Municipal Court)*  
E-mail: [info@trebag.hu](mailto:info@trebag.hu)  
Phone: +36 26 555 220  
Fax: +36 26 555 222

### Host (data storage):

Name: NET-SNAKE Bt.  
Registered seat: Nagy Lajos király út 212. I/11. Budapest, Hungary H-1149  
E-mail: [dobos.oliver@nsinfo.hu](mailto:dobos.oliver@nsinfo.hu)  
Phone: 06-70- 9059505

## Types of managed data and purpose of data control

### 1. Personal data and purpose of data control

**1. The contents of certain programmes and projects of Data Controller** may only be accessed upon registration which includes the provision of personal data. For those registered at the Webpage, Data Controller controls the following personal data to be able to identify and contact interested parties:

- email address,
- IP address,
- user name.

For those registered at the Webpage, Data Controller may control the following personal data as agreed upon by Interested Party:

- full name,
- email address

Electronically recorded data are stored by Data Controller in Data Controller's information system.

### 2. Technical data and purpose of data control

While operating the website <https://transit.trebag.hu/> (hereinafter: the Website) Data Controller controls the data of the visitors (Interested Parties). The purpose of Data Control is to improve the service, monitor visitors and survey and measure the habits of visitors.

When requested by the authorities or the relevant regulations, Data Controller is obliged to provide access to the requested data.

Whenever Data Controller wishes to use the provided data for purposes other than those specified when collecting these data at the first place, Data Provider shall inform Interested Party about this intent and request Interested Party's expressed, prior consent. Data Provider shall also allow Interested Party to deny such consent.

Data Controller hereby declares that the data provided by Interested Party shall be used for the specified purpose and shall not be used for any other unspecified purpose. However, when requested by the authorities or the relevant regulations, Data Controller is obliged to provide access to the requested data. Interested Party hereby takes notice of this by approving this Document and expressly agree so that

Data Controller should not request any further consent to such actions. In this respect, Interested Party shall not lay any claims at Data Controller.

Data Controller will not check the provided personal data and their validity.

## **2. Basis for Data Control**

Regarding technical data, Interested Party automatically approves the contents of this Privacy Statement and the control of their data by Data Controller when visiting the Website and registering.

Data Control is based on the voluntarily made, informed, clear and expressed Consent by Interested Party as prescribed by 5. § (1) a) of the Information Act.

## **3. Controlled data**

According to Section 1 of this Document, controlled data typically include family names, first names and email addresses as well as data generated during service provision while interested parties use their computers for logging in and automatically recorded by the information system of Data Controller during technical processes. These include in particular the data and time of visit, the IP addresses of the computers and the types of the browsers and operation systems used.

Automatically recorded data are logged by the system at logging in and logging out without any specific consent or action by Interested Party. Electronically managed data in various databases are not linked nor is it possible to assign them to Interested Party, unless it is facilitated by the law.

When links are received from external servers or they refer to such servers, they do not fall under the competence of Data Controller. The providers of these links are able to collect user data due to the direct connections to their servers.

The independent measuring and auditing of visitor data and other web analytics (Google Analytics) data of the Website are promoted by external servers. Regarding the control of the measured data, information is provided by the relevant data controller entities at [www.google.com/analytics/](http://www.google.com/analytics/).

## **4. Duration of data control**

The scope of personal data specified in Section 1 of this Document is limited to the possible minimum by Data Controller. Data Controller also intends to store personal data for a duration as short as possible. As a deadline for deleting personal data, the end of a given project maintenance period, the end of mandatory retention periods, the end of mandatory periods for tolerating audits and the duration of taking liability for irregularities in submitted documents are defined as applies.

Data recorded automatically as a technical result of the operation of the system are retained as long as justified by operational needs. Data Controller guarantees that these automatically recorded data cannot be linked to other personal user data except for the cases specified by the relevant legislation.

## **5. Access to data**

The personal data of Interested Party may be accessed by the staff, agents and partners of Data Controller, while technical data by the staff, agents and subcontractors operating the Website (hereinafter: contributors).

## **6. Exercising rights and legal remedies**

### **Rights of Interested Party regarding the control of personal data and legal remedy**

Interested Party may request any time:

- a) information about the control of personal data,
- b) the rectification of personal data and
- c) the removal of personal data.

#### **6.1. Right for information**

During the duration of data control, Interested Party may request access to personal data as well as their rectification, removal or limited use or may object to their control. Upon request, Data Controller shall inform Interested Party about data related to and controlled by Data Controller, the hosting service provider, the source of data, the purpose, legal basis and duration of data control, the processor of data and its activities related to data control and any other data or subject specified by the relevant regulations, including the circumstances, impacts and countermeasures related to any potential data security breach. Data Controller shall provide the requested information within 25 days of receiving the request the latest. Interested Party may contact the staff of Data Controller at any contacts given above regarding questions or remarks related to data control.

Should Interested Party have any complaint, Interested Party has the right to address Data Controller.

#### **6.2. Right of access to data**

During the duration of data control, Interested Party may request feedback from Data Controller as to whether the control of personal data is in progress and if yes, Interested Party shall have the right of access to personal data and the following information.

### **6.3. Right to revoke consent**

Interested Party shall have the right to revoke his/her consent any time. However, revoking consent does not impact the legality of data control performed as allowed previously by Interested Part.

### **6.4. Right of rectification**

Interested Party shall have the right to rectify data recorded incorrectly i.e. when requested by Interested Party at any of the contacts specified above Data Controller shall rectify or amend the incorrect personal data of Interested Party without any undue delay.

### **6.5. Right to request the removal of data. „Right to be forgotten”**

Interested Party shall have the right to request the removal of his/her data any time at the contacts provided above. The request for removal shall clearly specify the data to be removed and the identity of Interested Party. Should Interested Party request it, Data Controller shall remove every piece of data specified in Interested Party's written request sent to any of the contacts given above within 25 days of receiving such request. Once the requested data are removed by Data Controller within the deadline specified above, such data cannot be restored any more. Data removal does not include those included in the data control required by the relevant legislation which are retained by Data Controller as long as required by the regulations.

### **6.6. Objection to use personal data**

Interested Party may object to the use of personal data. As soon as possible but within 15 days of receiving the objection the latest, Data Controller reviews the objection and its justification and informs Interested Party about the decision in the matter.

### **6.7. Right to limit data control**

Should Interested Party dispute the accuracy of personal data, it renders data control unlawful. Interested Party may disagree with the removal of data and instead may request limiting the use of data.

### **6.8. Exercising rights and legal remedies**

Interested Party may request to have personal data modified or removed any time. If Data Controller does not comply with this request, the Interested Party shall be notified about this fact and its justification within 30 days of Data Controller receiving the request in writing. When Interested Party requests the modification or removal of data, Data Controller informs Interested Party about the possibilities of legal remedy and that complaints may be filed at Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of

Information; Szilágyi Erzsébet fasor 22/c Budapest, Hungary H\_1125). Interested Party may also initiate a court procedure to exercise his/her rights.

## **7. Websites and services of third parties**

The Website may contain links to the websites or services of third parties or may use or provide the products or services of third parties. Data collected by third parties may include location or contact data. These fall under the scope of the privacy policy of the aforementioned third parties and as such, Data Controller shall bear no responsibility for them.

## **8. Data Security**

Data Controller undertakes to provide for the security of the data and take all the necessary technical and organisational measures as well as develop the necessary procedures to guarantee the security of the recorded, stored and controlled data. Data Controller also makes every effort to prevent unauthorised access to or modification of the data and their destruction.

## **9. Client Service and the reporting of technical problems**

Should Interested Parties have any questions or complaints, please contact Data Controller at [info@trebag.hu](mailto:info@trebag.hu).

## **11. Final provisions**

If you do not agree with the provisions of this Document, please do not use the Website.

Data Controller maintains the right to unilaterally amend this Document. In such a case, Data Controller shall inform Interested Parties about the amendment on the Website. The updated version of this Document is always available under the relevant menu option of the Website.

This Privacy Statement enters into force on 01 January 2021.