

# **Data processing information**

**On the rights of the natural person concerned  
regarding the processing of his/her personal data**

## Introduction

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (hereinafter referred to as the Regulation) requires that the Data Controller shall take appropriate measures to provide the data subject with any information relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language, and that the Data Controller shall facilitate the exercise of the data subject's rights.

The obligation of prior information of the data subject is also prescribed by Act CXII of 2011 on the right to informational self-determination and freedom of information.

We comply with this legal obligation by providing the information below.

The information must be published on the Company's website or sent to the person concerned upon request!

## Chapter I Name of the data controller/data processor

The publisher of this information, which is also the Data Controller:

Company name:	Ditusz Consulting Ltd.
Headquarters:	1061 Budapest, Székely Mihály Street 5, ground floor,
Tax number:	13706452-2-42
Company registration number:	10-09-936949
Email address:	info@ditusz.hu
Website:	<a href="http://budapestharmonyapartments.com">budapestharmonyapartments.com</a>
Represented by:	Dr. János Szinetár

(hereinafter referred to as: Company)

## Chapter II Name of data processors

Data processor: the natural or legal person, public authority, agency or any other body which processes personal data on behalf of the data controller; (**Regulation Article 4, paragraph 8**)

The use of a data processor does not require the prior consent of the data subject, but it is necessary to inform them. Accordingly, we provide the following information:

## 1. Our company's IT service provider

Our company uses a data processor to maintain and manage its website, who provides IT services (hosting services) and, within this framework, processes the personal data provided on the website for the duration of our contract with them. The operation performed by them is the storage of personal data on the server.

The name of this data processor is as follows:

Company name:	MessaNet Ltd.
Headquarters:	2016. Leányfalu Körte u. 2
Company registration number:	13-09-130984
Representative:	Zsolt Garamszegi
Phone number:	+ 36 20 3289644
Email address:	<a href="mailto:zsolt.garamszegi@messanet.hu">zsolt.garamszegi@messanet.hu</a>

Company name:	Integrity Informatics Ltd.
Headquarters:	8000. Székesfehérvár Gyetvai Street 6.
Company registration number:	07-09-003739
Representative:	Dr. Agnes Kollar
Phone number:	+ 36 1 450-2660
Email address:	<a href="mailto:info@integrity.hu">info@integrity.hu</a>

## 2. Our company's accounting service provider

To fulfill its tax and accounting obligations, our Company uses an external service provider under an accounting service provider contract, who also processes the personal data of natural persons who have a contractual or payer relationship with our Company, for the purpose of fulfilling the tax and accounting obligations of our Company.

The name of this data processor is as follows:

Company name:	Fibra Trading and Service Ltd. 9022.
Headquarters:	Győr Liszt Ferenc Street 1
Company registration number:	08-09-003626
Phone number:	+ 36 70 3899286
Representative:	Imre Vegh
Email address:	<a href="mailto:vegh.imre@ermi-tim.hu">vegh.imre@ermi-tim.hu</a>

## 3. Postal services, delivery, parcel delivery

These data processors receive the personal data necessary for the delivery of the ordered product from our Company (name, address, telephone number of the data subject) and use this to deliver the product.

The name of this service provider is as follows:

Company name:	HUNGARIAN POST Co., Ltd.
Headquarters:	1138 Budapest, Dunavirag Street 2-6.
Company registration number:	01-10-042463

Statistical number: 10901232-5310-114-01  
Tax administration number: 10901232-2-44

#### 4. Our company's legal administrator

Our Company uses an external service provider for legal protection under a service provider contract, who also processes the personal data of natural persons who have a contractual or payer relationship with our Company.

The name of this data processor is as follows:

Name:	Dr. Melinda Sléder, individual lawyer,
Headquarters:	2461 Tárnok, Sport u. 11
Mailing address:	1161 Budapest, Gusztáv u. 71
Phone number:	+ 36 30 4782920
Email address:	<a href="mailto:slederm.dr@gmail.com">slederm.dr@gmail.com</a>

- (5) Duration of storage of personal data: Until the application or tender is assessed. The personal data of applicants who are not selected must be deleted. The data of those who have withdrawn their application or tender must also be deleted.
- (6) The employer may only retain applications based on the express, unambiguous and voluntary consent of the data subject, provided that their retention is necessary to achieve the purpose of the data processing in accordance with the law. This consent must be requested from the applicants after the conclusion of the recruitment procedure.

### Chapter III

## Contract-related data processing

#### 1. Management of data of contracting partners – registration of customers and suppliers

- (1) Our Company processes the name, birth name, date of birth, mother's name, address, tax identification number, tax number, entrepreneur's or primary producer's ID number, ID number, address, registered office, location address, telephone number, e-mail address, website address, bank account number, customer number (partner number, order number), online identifier (list of customers, suppliers, regular purchase lists) of the natural person who has contracted with it as a customer or supplier for the purpose of concluding, fulfilling, terminating the contract, and providing a contractual discount. This data processing is considered lawful even if the data processing is necessary to take steps at the request of the data subject prior to concluding the contract. The recipients of personal data are: the Company's employees performing tasks related to partner service, employees performing accounting and taxation tasks, and data processors. Duration of personal data processing: 5 years after the termination of the contract.
- (2) Before the commencement of data processing, the data subject must be informed that the data processing is based on the legal basis of the performance of the contract; this information may also be provided in the contract.
- (3) The data subject must be informed about the transfer of his or her personal data to the data processor.

## **2. Contact details of natural person representatives of legal entity partners, customers, suppliers**

- (1) The scope of personal data that can be processed: the name, address of the natural person, your phone number, email address, online ID.
- (2) Purpose of processing personal data: Performance of the contract concluded with the Company's legal entity partner, business relations, legal basis: consent of the data subject.
- (3) Recipients of personal data and categories of recipients: Employees of the Company performing tasks related to partner service.
- (4) Duration of storage of personal data: 5 years after the business relationship or the representative status of the data subject.

## **3. Processing of personal data of the person using the accommodation service when booking**

The National Tourism Data Service Center (NTAK) is a modern, digital data service system run by the Hungarian Tourism Agency (MTÜ) with the main goal of increasing the competitiveness of domestic tourism. The digitalization of the sector enables the collection of anonymized traffic and statistical data from all Hungarian accommodation establishments, in full real time.

The basic requirement for data provision is that data provision to NTAK is possible only through hotel PMS software. Therefore, accommodation providers operating with more than 8 rooms and 16 beds must choose NTAK compatible PMS software.

- (1) Our company complies with the statutory obligation by using the SabeeApp cloud-based PMS software.
- (2) The software transmits data required by the NTA.
- (3) You can find information about the processing of personal data on the SabeeApp website or at the link below.

<https://www.sabeeapp.com/hu/adatvedelem>

## **4. Processing of personal data of the person using the accommodation service upon entry**

- (1) The State Budget for the Development of Tourist Areas entered into force on 1 January 2021. Amendment to Act CLVI of 2016 on the duties of accommodation providers, which obliges the accommodation provider to record the data of the users of the accommodation service specified in the law in a storage space provided by the hosting service provider designated by the Government for the purposes specified in the law.
- (2) The hosting service provider designated by the Government is the Hungarian Tourism Agency (MTÜ).

- (3) The tasks of the storage facility introduced by the amendment to the law are performed by the Guest Information Closed Database (VIZA) system.
- (4) When the user of the accommodation service logs in, our company records the following data using a document reader – via the accommodation management software – in the storage space provided by the storage service provider designated in the Government Decree:
1. last name and first name
  2. birth surname and first name
  3. place and time of birth
  4. gender
  5. nationality
  6. mother's birth surname and first name;
  7. identification data of the personal identification document or travel document
  8. identification data of the personal identification document or travel document (in the case of a guest over the age of 14).

The accommodation may also record the listed data based on the declaration of a representative (e.g. parent, guardian) of guests under the age of 14.

It is not necessary to record data that is not contained in the document.

## **5. Visitor data management on the Company's website**

- (1) Cookies are short data files that are placed on the user's computer by the visited website. The purpose of a cookie is to make the given infocommunication and internet service easier and more convenient. There are many types, but they can generally be divided into two large groups. One is a temporary cookie, which the website places on the user's device only during a given session (e.g. during the security identification of an online banking session), and the other type is a permanent cookie (e.g. the language setting of a website), which remains on the computer until the user deletes it. According to the European Commission's guidelines, cookies [unless they are absolutely necessary for the use of the given service] can only be placed on the user's device with the user's permission.
- (2) In the case of cookies that do not require the user's consent, information must be provided during the first visit to the website. It is not necessary for the full text of the information on cookies to appear on the website; it is sufficient for the website operators to briefly summarize the essence of the information and provide a link to the full information.
- (3) In the case of cookies requiring consent, the information may also be related to the first visit to the website if the data processing associated with the use of cookies begins with the visit to the website. If the use of the cookie is related to the use of a function expressly requested by the user, the information may also be displayed in connection with the use of this function. In this case, it is not necessary for the full text of the information on cookies to be displayed on the website; a short summary of the essence of the information and a link to the availability of the full information are sufficient.

## 6. Information about the use of cookies

- (1) In accordance with common internet practice, our Company also uses cookies on its website. A cookie is a small file containing a series of characters, and which is placed on the visitor's computer when they visit a website. When they visit the website again, the cookie allows the website to recognize the visitor's browser. Cookies can store user settings (e.g. chosen language) and other information. Among other things, they collect information about the visitor and their device, remember the visitor's individual settings, and can be used, for example, when using online shopping carts. Cookies generally make the website easier to use, help the website provide a real web experience for users and be an effective source of information, and also ensure that the website operator can monitor the operation of the website, prevent abuse, and provide the services provided on the website smoothly and at an appropriate level.
- (2) Our company's website records and processes the following data about the visitor and the device used for browsing when using the website:
- the IP address used by the visitor,
  - browser type,
  - characteristics of the operating system of the device used for browsing (set language),
  - date of visit,
  - the (sub)page, function or service visited.
- (3) Accepting or allowing the use of cookies is not mandatory. You can reset your browser settings to refuse all cookies or to indicate when a cookie is being sent. Most browsers automatically accept cookies by default, but these can usually be changed to prevent automatic acceptance and offer you the option each time.

**You can find information about cookie settings for the most popular browsers at the links below.**

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=en>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelizeze-es-tiltasa-amit-weboldakshazn>
- Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internetexplorer/delete-manage-cookies#ie=ie-11>
- Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internetexplorer/delete-manage-cookies#ie=ie-10-win-7>
- Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/deletemanage-cookies#ie=ie-9>
- Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/deletemanage-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>

However, please note that certain website features or services may not function properly without cookies.

(4) The cookies used on the website are not capable of identifying the user by themselves.

(5) Cookies used on the Company's website:

### **5.1. Technically essential session cookies**

These cookies are necessary to enable visitors to browse the website, to use its functions smoothly and fully, and to use the services available through the website, including, among other things, to remember the actions taken by the visitor on the given pages during a visit. The duration of data processing of these cookies applies only to the visitor's current visit, and this type of cookie is automatically deleted from your computer when the session ends or the browser is closed.

The data handled is: AVChatUserId, JSESSIONID, portal referer.

The legal basis for this data processing is Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elker Act).

The purpose of data management is to ensure the proper functioning of the website.

### **5.2. Cookies requiring consent:**

These enable the Company to remember the user's choices regarding the website. The visitor may prohibit this data processing at any time before and during the use of the service. These data cannot be linked to the user's identification data and cannot be transferred to a third party without the user's consent.

#### **5.2.1. Cookies that facilitate use:**

The legal basis for data processing is the visitor's consent.

Purpose of data management: Increasing the efficiency of the service, enhancing user experience, and making the use of the website more convenient.

The duration of data management is 6 months.

#### **5.2.2. Performance cookies:**

Google Analytics cookies – you can find out more about this here: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookieusage>

Google AdWords cookies - you can find out more about this here: <https://support.google.com/adwords/answer/2407785?hl=en>

## **7. Registration on the Company's website**

(1) On the website, the natural person registering may give their consent to the processing of their personal data by checking the relevant box. It is prohibited to check the box in advance!



- (2) The scope of personal data that can be processed: the name (surname, first name), address, telephone number, e-mail address, online identifier of the natural person.
- (3) The purpose of processing personal data is:
  - Performance of services provided on the website.
  - Contact via email, telephone, SMS and postal inquiry.
  - Information about the Company's products, services, contract terms and conditions, and promotions.
  - Advertising materials can be sent electronically and by post during the information period.
  - Analysis of website usage.
- (4) The legal basis for data processing is the consent of the data subject.
- (5) Recipients of personal data and categories of recipients: employees of the Company performing tasks related to partner service and marketing activities, employees of the Company's IT service provider providing hosting services as data processors.
- (6) Duration of storage of personal data: until the registration/service exists or until the data subject withdraws his/her consent (deletion request).

## **8. Data processing related to newsletter service**

- (1) A natural person registering for the newsletter service on the website may give his/her consent to the processing of his/her personal data by checking the relevant box. It is prohibited to check the box in advance. The data subject may unsubscribe from the newsletter at any time by using the "Unsubscribe" application of the newsletter, or by making a written or e-mail statement, which constitutes the withdrawal of consent. In such a case, all data of the unsubscribed shall be deleted immediately.
- (2) The scope of personal data that can be processed: the name (surname, first name) of the natural person, e-mail address.
- (3) The purpose of processing personal data is:
  - Sending a newsletter about the Company's products and services
  - Send advertising material
- (4) Legal basis for data processing: consent of the data subject.
- (5) Recipients of personal data and categories of recipients: employees of the Company performing tasks related to partner service and marketing activities, employees of the Company's IT service provider as data processors for the purpose of providing hosting services,
- (6) Duration of storage of personal data: until the newsletter service is available or until the data subject withdraws his/her consent (deletion request).

## **9. Community Guidelines / Data Management on the Company's Facebook Page**

- (1) The Company maintains a Facebook page to introduce and promote its products and services.
- (2) A question posted on the Company's Facebook page does not constitute an officially submitted complaint.
- (3) The Company does not process personal data published by visitors to the Company's Facebook page.

- (4) Visitors are subject to Facebook's Privacy and Terms of Service.
- (5) In the event of the publication of illegal or offensive content, the Company may exclude the person concerned from membership or delete their comment without prior notice.
- (6) The Company is not responsible for any illegal data content or comments published by Facebook users. The Company is not responsible for any errors, malfunctions or problems arising from changes to the operation of Facebook.

## **Chapter IV**

### **Data processing based on legal obligation**

#### **1. Data processing for the purpose of fulfilling tax and accounting obligations**

- (1) The Company processes the data of natural persons entering into business relations with it as buyers or suppliers, as specified by law, for the purpose of fulfilling legal obligations and tax and accounting obligations (accounting, taxation). The processed data, in accordance with Sections 169 and 202 of Act CXXVII of 2017 on Value Added Tax, include in particular: tax number, name, address, tax status, based on Section 167 of Act C of 2000 on Accounting: name, address, designation of the person or company ordering the economic transaction, the signature of the person issuing the order and the person certifying the execution of the order, and, depending on the company, the signature of the auditor; on the stock movement documents and cash management documents, the signature of the recipient, and on the counter-receipts, based on Act CXVII of 1995 on Personal Income Tax: entrepreneur's certificate number, primary producer's certificate number, tax identification number.
- (2) The storage period of personal data is 8 years after the termination of the legal relationship that gave rise to the legal basis.
- (3) Recipients of personal data: the Company's tax, accounting, payroll, employees and data processors performing social security tasks.

#### **2. Payer data management**

- (1) The Company processes the personal data of those data subjects – employees, their family members, employees, recipients of other benefits – prescribed in tax laws, with whom it has a relationship with its payers (Act CL. 2017:CL. on the Taxation System (Art.) 7.§ 31.) for the purpose of fulfilling tax and contribution obligations prescribed by law (tax, tax advance, contribution determination, payroll accounting, social security, pension administration). The scope of the processed data is defined in Art. 50.§ defines, specifically highlighting: the natural person's personal identification data (including the previous name and title), gender, citizenship, the natural person's tax identification number, and social security identification number (TAJ number).  
If tax laws provide for a legal consequence, the Company may process data related to employees' health insurance (Szja tv. § 40) and professional association membership (Szja § 47 (2) b./) for the purpose of fulfilling tax and contribution obligations (payroll accounting, social security administration).

(2) The storage period of personal data is 8 years after the termination of the legal relationship that gave rise to the legal basis.

(3) Recipients of personal data: employees and data processors of the Company performing tax, payroll and social security (payer) tasks.

### **3. Data management regarding documents of lasting value according to the Archives Act**

(1) The Company manages its documents that are considered to be of permanent value under Act LXVI of 1995 on public documents, public archives and the protection of private archival material (Archives Act) in order to fulfill its legal obligation, for the purpose of:  
The permanently valuable part of the Society's archival material must remain intact and usable for future generations. Data storage period: until transfer to the public archives.

(2) The recipients of personal data and other issues of data processing are governed by the Archives Act.

### **4. Data processing for the purpose of fulfilling anti-money laundering obligations**

(1) The Company processes the data of its clients, their representatives and beneficial owners, as specified in Act LIII of 2017 on the Prevention and Combating of Money Laundering and the Financing of Terrorism (Pmt.), in order to fulfill its legal obligation and to prevent and combat money laundering and terrorist financing:  
*the* natural person *the* family name and first name, *b*) your birth surname and first name, *c*) citizenship, *d*) place and time of birth, *e*) mother's birth name, *f*) address, or in the absence of such address, place of residence,  
*g*) the type and number of your identification document; the number of your official ID card proving your address, and a copy of the documents presented. (§ 7).

(2) Recipients of personal data: the Company's employees performing tasks related to partner service, the Company's manager and the Company's designated person pursuant to the Pmt.

(3) The period of storage of personal data: 8 years from the termination of the business relationship or the fulfillment of the transaction order. (Pmt. § 56 (2))

## **Chapter V**

### **Summary information on the rights of the data subject**

In this chapter, for the sake of clarity and transparency, we briefly summarize the rights of the data subject, detailed information on the exercise of which is provided in the following chapter.

#### **Right to prior information**

The data subject has the right to be informed about the facts and information related to data processing before the start of data processing.

(Regulation (Articles 13-14))

We will provide information about the detailed rules in the next chapter.

### **The data subject's right of access**

The data subject has the right to receive feedback from the Data Controller as to whether his or her personal data is being processed and, if such processing is taking place, he or she has the right to access the personal data and related information as specified in the Regulation.

**(Regulation (Article 15).**

We will provide information about the detailed rules in the next chapter.

### **The right to rectification**

The data subject shall have the right to obtain from the Controller, at his/her request, the rectification of inaccurate personal data concerning him/her without undue delay. Taking into account the purpose of the processing, the data subject shall have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

**(Regulation (Article 16).**

### **The right to erasure ("the right to be forgotten")**

1. The data subject has the right to request that the Data Controller erase personal data concerning him or her without undue delay, and the Data Controller is obliged to erase personal data concerning the data subject without undue delay if one of the reasons specified in the Regulation applies.

**(Regulation (Article 17)**

We will provide information about the detailed rules in the next chapter.

### **Right to restriction of data processing**

The data subject has the right to request that the Data Controller restrict data processing if the conditions specified in the order are met.

**(Regulation (Article 18)**

We will provide information about the detailed rules in the next chapter.

### **Notification obligation related to the rectification or erasure of personal data or the restriction of data processing**

The Data Controller shall inform all recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. Upon request, the Data Controller shall inform the data subject of these recipients.

**(Regulation (Article 19)**

### **The right to data portability**

Under the conditions set out in the Regulation, the data subject has the right to receive the personal data concerning him or her, which he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another Data Controller without hindrance from the Data Controller to whom the personal data have been provided **(Regulation (Article 20).**

### **The right to protest**

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to processing of personal data concerning him or her based on Article 6(1)(e) of the Regulation (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller) or point (f) of the Regulation (processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party). **Regulation (Article 21)**

### **Automated decision-making in individual cases, including profiling**

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which would produce legal effects concerning him or her or similarly significantly affect him or her.

**(Regulation (Article 22))**We will provide information about the detailed rules in the next chapter.

### **Restrictions**

Union or Member State law applicable to the Controller or the Processor may restrict, by means of legislative measures, the rights and obligations set out in Articles 12 to 22 and Article 34 and in accordance with Articles 12 to 22.

**(Regulation (Article 23))**We will provide information about the detailed rules in the next chapter.

### **Informing the data subject about the data protection incident**

If the data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall inform the data subject about the data breach without undue delay.**(Regulation (Article 34))**

### **Right to lodge a complaint with a supervisory authority (right to a judicial remedy)**

The data subject has 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 concerning him or her infringes the Regulation.

**(Article 77 of the Regulation)**We will provide information about the detailed rules in the next chapter.

**Right to an effective judicial remedy against the supervisory authority** Every natural and legal person has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him or her, or if the supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments or the outcome of the complaint submitted.

**(Article 78 of the Regulation)**We will provide information about the detailed rules in the next chapter.

### **Right to an effective judicial remedy against the controller or processor**

Every data subject shall have the right to an effective judicial remedy if 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 not in accordance with this Regulation.

**(Article 79 of the Regulation)**We will provide information about the detailed rules in the next chapter.

## **Chapter VI**

### **Submission of the data subject's request, measures taken by the data controller**

1. The Data Controller shall inform the data subject of the measures taken following his request to exercise his rights without undue delay, but in any case within one month of receipt of the request.
2. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by a further two months. The deadline

The Data Controller shall inform the data subject of the extension within one month of receipt of the request, indicating the reasons for the delay.

3. If the data subject has submitted the request electronically, the information shall be provided electronically, if possible, unless the data subject requests otherwise.
4. If the Data Controller does not take action following the data subject's request, it shall inform the data subject without delay, but no later than one month from the receipt of the request, of the reasons for the failure to take action and of the fact that the data subject may lodge a complaint with a supervisory authority and exercise his or her right to a judicial remedy.
5. The Data Controller shall provide the information pursuant to Articles 13 and 14 of the Regulation and the information on the data subject's rights (Articles 15-22 and 34 of the Regulation) and the action taken free of charge. If the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Data Controller shall, taking into account the administrative costs involved in providing the requested information or communication or in taking the requested action:

- You may be charged a fee of HUF 100,000, or
- may refuse to act on the request.

The Data Controller bears the burden of proving that the request is clearly unfounded or excessive.

6. If the Data Controller has reasonable doubts regarding the identity of the natural person submitting the request, it may request the provision of additional information necessary to confirm the identity of the data subject.