

## DATA PROTECTION INFORMATION

The **We Love Publishing Korlátolt Felelősségű Társaság**, further on: **We Love Publishing** (seat: 1077 Budapest, Wesselényi utca 4. 3. em. 15/b., tax number: 24797245-2-42;; e-mail:info@welovebudapest.hu), as data processor is accepting as mandatory the content of the present data protection and undertakes that all his data processing activities related to the operated site comply with the present information and the law in force.

The We Love Publishing is hereby presenting its data processing principles, detailing the requirements it set towards itself as a data processor and complies with.

### PURPOSE OF DATA PROCESSING

The objective of the present Policy aims that the visitors of the www.welovebudapest.hu website (further on: “**Website**“) get detailed and clear information about the processing of their personal data by the **We Love Publishing Korlátolt Felelősségű Társaság**, with special regard to the type of the processed data, the legal base of data processing and the rights and legal remedying possibilities related to data processing.

During the operation of the Website we undertake to comply with all the legal provisions in force related to data processing and data protection, with special regard to the provisions of the 2016/679 Decree of the European Union and the Council on the protection of the personal data of the natural entities and the free flow of such data, as well as the cancellation of the 95/46/EK decree („**GDPR**“), the provisions of the 2011/CXII act on the information self-determination right and the freedom of information („**Info tv.**“), the provisions of the 1998/VI act on the regulation of the personal protection during the mechanical processing of the personal data, the provisions of the 2010/CIV act on freedom of press and the basic rules of media content, the provisions of the 2010/CLXXXV act on the media services and mass communication and the related standpoint and recommendations of the national data Protection and Freedom of Information Authority.

Pursuant to the GDPR’s article 8. (1) the registration and the acceptance of subscription of the Users below the age of 16 respectively those with limited capacities require the consent and approval of the legal representative respectively guardian, otherwise the Data processor can’t accept the data of the minor person or the person with limited capabilities, the contact keeping submitted as such will be

deleted. The data processor – by considering the available technology – takes reasonable measures to check whether the consent was given by the person who exerts the parental supervisory right over the child.

The We Love Publishing is processing the data stored in the Subject databases according to the present data protection information and it does not forward them to third parties and does not make it available, except for the situations when the availability of this kind respectively data forwarding is mandatory based on the law or ordered by the authority or the court or it is specified by the present data processing information.

With the use of the Website and by contacting through it the subject people are expressly accepting the contents of the present data protection information and voluntarily give their consent to process and handle their personal data according to the present data protection information.

## **LEGAL BASE OF DATA PROCESSING**

The legal grounds of the processing of the data provided by the Subject persons in the Subject people's databases that can be accessed through the Website consists of the informed and voluntary consent of the Subject persons.

If the personal data were recorded with the consent of the subject person, then the data processor may still process the recorded data – by having no different provisions – with the purpose of meeting the related legal obligation, or with the purpose of enforcing the righteous interest of the data processor or the third party, if the enforcement of such interest is in proportion with the restriction of the right related to the protection of the personal data without any further consent, even after the withdrawal of the subject person's consent.

## **THE SCOPE OF PERSONAL DATA PROCESSED BY THE DATA PROCESSOR, DATA FORWARDING AND THE DURATION OF DATA PROCESSING**

The We Love Publishing declares that its data processing does not cover the scope of personal data related to the GDPR's article 9 (special category), no such data are being processed and if it obtains such data then it is deleting them immediately.

## **SCOPE OF PERSONAL DATA AND PURPOSE OF DATA PROCESSING**

## **COMMENTS**

You may make comments to the contents appearing in the Website and you can evaluate them. You can make a comment to the given content or can evaluate the comment if you are logged in your Facebook or Google+ account and you enable the Website to use the WeLoveBudapest application that enables the connection between the Website and your Facebook or Google+ account. By allowing the application that assures the connection you are assuring access for us to your basic Facebook or Google+ data (in such way to your public profile, including especially your name and profile picture, list of your friends, Facebook or Google+ e-mail address) and approve for us to process these data and you approve you're your comments appear on your Facebook or Google+ wall.

If you do not wish your comment to appear on the Facebook or Google+ wall, then prior publishing the comment you can ban this. We can have access to your above-mentioned data as long as you are logged in your Facebook or Google+ account. We inform you that regarding the shared contents the utilisation terms and conditions and the data protection policies of the Facebook and Google will be governing.

By publishing your comment in the Website you are expressly and voluntarily approving the processing of your name and profile picture according to the present Policy that appear according to your comments made on the Website and referring to your Facebook or Google+ identifier. We are processing these data until you are withdrawing your consent.

## **PRIZE COMPETITION**

You can voluntarily participate in the Prize competition that appears in the Website. You can participate in the prize competition if you are answering the question or tasks specified in the given prize competition, provide your data (not exclusively, differing from the prize competitions: name, e-mail address, phone number, gender, postal address) and approve the processing of these data by us.

With the participation in the prize competitions the Player gives his consent to process his personal data where the details of the data processing are defined by the description of the current Game and the Regulation of the Prize competition.

We are managing your data until the drawing of the prize takes place or until you are withdrawing your approval.

The details of the data processing related to the prize competition are defined by the description of the current Game and the regulation of the Prize competition. The deletion of the Service provider's Facebook application does not result in the withdrawal of the consent given for the sending of promotion-containing material with the purpose of direct business acquisition respective marketing.

## **DATE OF DATA PROCESSING**

The We Love Publishing is processing the data obtained through the Subject person through his application or afterwards through the Website or through any of our contacts during the period when the purpose of data processing does exist on condition that the We Love Publishing is automatically deleting the Subject person's data if the Subject person is asking for it according to the part of the data protection information related to the rights and remedying possibilities of the Subject person.

## **COOKIES AND WEB MARKERS**

You may visit the Website even without identifying yourself or providing your personal data.

In the website we are using cookies. The cookies are files that can identify you and they are storing your personal preferences and the technical data, such as the clicks and other navigational data. The navigational (click stream) data show us the sites you have visited and in what order. The cookies handle the ads appearing in and through the Website as well as they are measuring their effectiveness. We are using the cookies to customise your visit in our Website (e.g. to recognise you when you are visiting us again), to analyse the Website's traffic and to monitor the user trends, schemes and selections that refer to the downloadings and technical conditions related to the Website utilisation. This helps in perfecting the appearance and content of the Website in order to meet your needs. The cookies can be permanent (they remain on your computer till you are deleting them) and temporary (that are valid during the browsing only).

Nevertheless when you are visiting the Website our server is using web markers (web beacons) or similar technologies to automatically register certain data, such as your computer's IP address and the related information, such as the name of you Internet service provider, the type of the browser, name and language of the

operation system, the website from where you visited us, key words and other browser-supplementing (add-on) technologies that are suitable to provide content and the pages visited in the Website and their order, date and duration of visit. We are processing these data exclusively in a summarised, anonymised and processed format. These data are processed primarily for measuring the visit-related data, to make statistics, correct the errors and to increase the utilisation experience. by visiting the Website you are expressly approving the use of cookies and web beacons presented in the present Policy. The default settings of the majority of browsers permit the acceptance of cookies. However if you wish you can set your browser in such a way to reject the cookies coming from us or other sites. For further information please visit the Help menu of your e-mail client or browser. In addition take into consideration that certain areas of our Website can be accessed with cookies or similar instruments only, you should be aware that by switching off the cookies or similar instruments you disable the accessing or certain contents and services of ours.

We are handling the above data until you withdraw your consent. However the consent can be withdrawn if when there is a direct relationship between you and the data or such relationship can be restored. Otherwise the data can't be considered personal data.

## **THE DATA PROCESSOR**

The Personal are processed by the Website's operator, the We Love Publishing Korlátolt Felelősségű Társaság as the data processor.

## **THE DATA OF THE WE LOVE PUBLISHING AS DATA PROCESSOR, THE SCOPE OF PARTIES ENTITLED TO DO THE DATA PROCESSING**

Name: **We Love Publishing Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság**

Represented by: Száraz István Péter – managing director

Address: 1077 Budapest, Wesselényi utca 4. 3. em. 15/b.

E-mail: info@welovebudapest.hu

Company reg. no.: 01-09-182909

Tax number: 24797245-2-42

In connection with the website and the data supplied by the Concerned persons the data can be processed by the We Love Publishing Kft.'s representatives and

employees whose job or scope of tasks is related to the realisation of any purpose of the data processing.

## **FORWARDING OF THE PERSONAL DATA**

We are handing over the personal data to the GTS Hungary Távközlési Kft. (2040 Budaörs, Ipartelep u. 13-15.) that is performing data-processing-related activity and provides virtual server service for us. We are sharing the summarised and anonymised information of the Website visitors (with special regard to the visiting statistics) with our clients, partners, other website visitors and other third parties in order to inform them on what kind of users are visiting the Website and how.

## **LINKS**

Our Website may contain links to sites for which the present Policy is not valid and where the data protection practice may differ. These sites are not owned by us and we are not operating them. We recommend studying the data protection policies related to the sites of these third parties before supplying your personal data in such a site or using such a site, since we are not assuming liability for these and we are not checking the procedures with which the data are being collected, used, made accessible or handled in any other way in these sites.

## **SECURITY**

In the Internet it is not possible to assure the full protection, security of the personal data, however we do everything to protect your personal data, therefore we are applying such technical and organisational security measures that try to protect the personal data against the accidental or deliberate manipulation, loss, destruction, unauthorised publishing respectively access. Despite the above – considering the Internet's characteristics – we can't guarantee that no unauthorised third party will have access to your personal information during the unauthorised intrusion.

## **THE DATA PROTECTION OFFICIAL**

Pursuant to the GDPR's article 37 (1) the data manager is assigning a data protection official if the main activities of data manager involve data processing operations that – due to their characteristics, scope and/or objectives – require the substantial regular and systemic monitoring of the concerned parties; or the data

manager's main activities include the handling of the special categories of the personal data when considering the GDPR's articles 9 and 10.

The We Love Publishing is notifying every Concerned person that it does not handle data related to the GDPR's articles 9 and 10 and the data processor's main activity is covering the operation of the User's and the newsletter databases. These activities do not require the regular and considerable monitoring of the Concerned parties.

Considering all these the We Love Publishing as the data processor does not assign a data protection official however it is reviewing this decision every calendar year according to the all-time situation of the data processing.

#### **REPORTING THE DATA PROTECTION INCIDENT, INFORMING THE CONCERNED PARTY**

The We Love Publishing is reporting to the competent supervisory authority every data protection incident without unjustified delay, and if possible in maximum 72 hours after he got informed about the data protection incident except when the data protection incident is probably not involving risk regarding the natural persons' rights and liberties.

If the data protection incident is supposed to involve high risk regarding the natural persons' rights and liberties then the We Love Publishing is – without unjustified delay – notifying the Concerned parties about the data protection incident.

In the notification given toward the Subject person the We Love Publishing is clearly and understandably presenting the characteristics of the data protection incident and tells at least the information and measures contained in the GDPR's article 34. (2).

The We Love Publishing is not obliged to notify the Concerned person about the data protection incident if one of the following conditions is met:

- the data processor has taken proper technical and organising protective measures and these measures were applied in regard of the data concerned with the data protection incident, with special regard to the measures that disable the people unauthorised to access the personal data to understand the data;
- after the data protection incident the data processor took measures that assure that the high risk related to the concerned party's rights and liberties does probably not occur in the future;
- the notification would require unreasonably efforts. In such cases the subject people will be informed through publicly announced information or there is

need for similar measures that assure the similarly efficient notification of the concerned parties.

#### **RIGHTS OF THE SUBJECT PARTIES RELATED TO THE DATA PROCESSING, RESPECTIVELY LEGAL REMEDYING POSSIBILITIES**

Pursuant to the GDPR's articles 12 – 22 the Subject person is entitled to

- the right to have access and the right to be informed pursuant to which the We Love Publishing is obliged to inform the Subject person about the rights he is entitled to according to the GDPR, the data protection incidents and the information contained in the GDPR's articles 13 and 15; and
- the right of carrying the data, and the right to correction and deletion, simultaneously the right to make objection.

As accordingly the data processor

- is informing the subject person about the processing of his personal data, and within this the Subject party's data handled by him respectively processed by the assigned by him or according to his orders, their source, the purpose of data processing, legal grounds, duration, name, address of the data processor and the activity related to the data processing, circumstances of the data protection incident, impacts and the measures taken to avoid it (if there was any) and – if the Subject person's data are being forwarded – the legal grounds and addressee of the data forwarding; and
- he is correcting, deleting or blocking the personal data supplied by the Subject person (the Subject person can himself delete his personal data in the was specified during the registration, and he can also ask for the deletion through the data processor's customer service).

#### **Notification about the rights**

In order to fulfil the above-mentioned the data processor takes measures in order to supply every announcement in a concise, clear, transparent, understandable and easily accessible format, especially in case of the information supplied for the children. The information shall be supplied in writing or other way – including the electronic way. If requested by the Subject person even oral announcement can be supplied provided that the Subject person's identity has been proved somehow.

The data processor is assisting in the exertion of the Subject persons' rights. The data processor without unjustified delay de definitely in maximum one month from receiving the request is notifying the Subject person about the measures taken based on the request according to the GDPR's articles 15–22.



If required and taking into consideration the complexity of the request and the number of requests, this deadline may be prolonged with two more months. The data processor is notifying the Subject person about the prolonging of the deadline in a month from receiving the request by specifying the reason of delay.

If such measures are not being taken, then without delay but in maximum one month from receiving the request the data processor is informing the Subject person about the reasons of not taking the measures, and about the fact that the Subject person can submit a complaint at a supervisory authority and may contact the court for legal remedy.

The data processor is assuring the information – related to the GDPR's article 13 – as well as the above information and measures free of charge. If the Subject person's request is clearly ungrounded or – especially to its repetitiveness – is excessive, the data processor - considering the administration expenses related to the requested information or notification or the measures – may ask for a reasonable fee or can refuse the request-based measures. The request is clearly ungrounded or the proving of its excessive characteristics is the task of the data processor.

### **Notification and the access to the personal data**

At the moment of obtaining the personal data the data processor is supplying the Subject person with the information contained in the GDPR's article 13 (1) - (2).

The Subject person is entitled to get feedback from the data processor on whether the processing of his personal data is in progress and if such data processing is in progress then he is entitled to have access to the personal data and the information contained in the GDPR's article 15 (1) - (2) (right of the subject person to have access).

The data processor is supplying the Subject person with the copy of the personal data that form the subject of data processing. The data processor may ask for a reasonable fee for the further copies requested by the Subject person based on the administrative cost. If the subject person has submitted the application electronically then the information shall be supplied in the widely used electronic format, except when the Subject person asks otherwise.

### **Right to transfer the data jog**

Pursuant to the GDPR's article 20 the Subject person is entitled to receive the related personal data supplied by him to the data supplier, in a widely used mechanically legible format, and he is also entitled to eventually forward these data to another data processor (right to carry the data).

## **Correction, deletion and objection**

Regarding the future the Concerned person can any time – without justification -withdraw his consent related to data processing. Pursuant to the GDPR's articles 16-18 the Subject person is entitled to correction, deletion of the data and the restriction of the data processing.

As accordingly the Concerned person is entitled to ask the data processor - without unjustified delay – to delete the related personal data, and the data processor is obliged to delete the related personal data without unjustified delay if the personal data are no longer required for the purpose used for collection or processing; pursuant to the article 6 (19) of the GDPR the subject person withdraws his consent that formed the base of the data processing, and the data processing has no other legal base; the subject person is objecting against the data processing, and there is no primary legal reason for the data processing; the personal data were processed illegitimately; or if the personal data need to be deleted in order to meet the legal requirements stipulated in the EU or Hungarian law.

In addition – pursuant to the article 21 of the GDPR – the subject person is entitled to object against the processing of the personal data supplied by him. Thus the Subject person is entitled to object any time against the processing of his personal data due to reasons related to his condition.

Should the Subject person object then the data processor may not process the data any longer, except when the data processor proves that the data processing is justified by coercive legitimate reasons that are primary over the Subject person's interests, rights and liberties or that are related to the submitting, enforcing or protection of legal claims.

If the processing of the personal data takes place with the purpose of direct business gain (e.g. newsletter sending), the subject person is entitled to object against the processing of his personal data with this purpose.

## **Right to legal remedy**

The Subject person may send questions and notifications related to the above through the [info@welovebudapest.hu](mailto:info@welovebudapest.hu) e-mail address and the following address of the We Love Publishing: 1077 Budapest, Wesselényi utca 4. 3. em. 15/b.

During the exertion of the rights related to the processing of the personal data the Subject person may contact the National Data Protection and Liberty of Information Authority (NAIH) respectively to the Court for legal remedy

according to the GDPR and the Info tv. if the request respectively notification sent to the data processor is being rejected, or the contents are not fulfilled.

In addition the subject person

- in order to enforce his/her rights related to the processing of the personal data,
- in order to get compensation for the damages caused by infringing the data security requirements or the illegal processing of the data, and
- because of the infringement of his personal rights in connection with the illegal processing of the data and regarding the infringement of the data security requirements, in order to ask for compensation

can contact the court according to the contents of the GDPR's articles 77-82.

The concerned people are entitled to all the rights, legal remedying and other claim enforcing possibilities specified in the law, the GDPR and the Info tv.

## **MODIFICATION OF THE POLICY**

We are regularly review and modify the present Policy so that it complies with our objectives and the data protection law in force. When the present Policy gets modified then we are publishing the modified version in the Website.

We recommend to regularly review the present Policy to be updated about all the facts and information related to the processing of your personal data.

Made in: Budapest, May 25, 2018