

Data Protection Notice

Látóhatár Kiadó Kft. - pestbuda.hu

I. Introduction

1.1. The goal of this Policy is to provide the Users of services provided by Látóhatár Kiadó information about the scope and method of data handling connected to personal data that occurs in connection to the use of these services.

1.2. As Data Controller, Látóhatár Kiadó defines the goals and tools of data handling independently or with its partners.

1.3 As Data Controller, Látóhatár Kiadó respects the personal data of all users that share such data with the company during the use of these services and takes every step required to protect all personal data.

II. Definitions

2.1 Data Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

2.2 Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

2.3 Personal Data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

2.4 Data Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

2.5 Website refers to the website and online publication provided by the Data Controller on the domain pestbuda.hu

2.6 Services refer to the services provided by the Data Controller or Data Processors.

2.7 User means the natural person who registers to or uses the services.

2.8 Third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under

the direct authority of the controller or processor, are authorised to process personal data.

III. The Data Controller and Data Processors

3.1. The Data Controller

Name: Látóhatár Kiadó Lap- és Könyvkiadó Korlátolt Felelősségű Társaság

Headquarters: Székhely: 1026 Budapest, Törökvész lejtő 21

Website: <https://pestbuda.hu/>

Contact: Halász Csilla

Telephone: 06-30-273-1715

E-mail: szerkesztoseg@latohatarkiado.hu

3.2. Individuals with access to Data:

Employees and contracted partners of Látóhatár Kiadó whom would be unable to perform their tasks or contractual obligations without access to personal data, these include:

- a) CEO - as part of their monitoring and quality control role, and in connection with marketing activities.
- b) Marketing and communications teams - working to optimise performance and remarketing through the analytical data collected by automated analytics systems.

3.3. Websites operated by the Data Controller

<https://pestbuda.hu>

3.4. Storage provider of the websites operated by the Data Controller (third party)

Name: Vármegye Média Kft.

Headquarters: 1089 Budapest, Bíró Lajos utca 60.

Website: <https://varmegye.com/>

E-mail: info@varmegye.com

3.5. Data Processors:

- a) Facebook Ireland Ltd. (headquarters: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland), which provides information pertaining to the advertisements the Data Controller creates through its platform
- b) Google LLC. (headquarters: 18 Lower Leeson Street, Dublin 2, DO2 HE97, Ireland), which provides information pertaining to User activity on the Websites.

3.6. Users may communicate requests pertaining to the handling of their data by Látóhatár Kiadó by post to the following address: 21. Törökvész lejtő, Budapest, Hungary, 1026 or through email at szerkesztoseg@latohatarkiado.hu. Requests will be processed as soon as possible but with 30 days at the latest, at which time a response will be provided to a specified address.

IV. The purpose, legal basis and duration of Data Handling and Data Processing

4.1. The goal of Data Handling

4.1.1. Látóhatár Kiadó processes data in the following cases in accordance with effective regulations:

- a) digital marketing activities;
- b) the creation of digital analytics and reports
- c) handling of contact information for contractual partners to ensure completion of contractual obligations
- d) protection of property and data
- e) in order to comply with legal obligations

4.2. The legal basis of Data processing

- a) GDPR Art. 6. (1a): the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) GDPR Art. 6 (1b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) GDPR Art. 6 (1c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) GDPR Art 6 (1f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party,

4.3. The legal basis of separate acts of data processing

- a) continuity of contact: (in the case of the personal data of employees of contracted partners) GDPR Art. 6 (1f). The legitimate interest of the Data Controller: continuous operation of business and performance of contractual obligations
- b) handling the data of contracted partners: GDPR 6. Art 6 (1b)
- c) marketing activities: GDPR Art. 6 (1a)
- d) Online registration: GDPR Art. 6. (1a)

4.4. When data processing occurs under GDPR Art. 6 (1f), the following check is conducted to identify the legitimate interest:

- a) the legitimate interest is identified and recorded
- b) the rights of the individual are identified and recorded
- c) deliberation based on requirements and proportionality, data frugality and limited storage
- d) the concerned individual is informed of this decision

4.4.1. The concerned individual has the right to protest this decision. In such cases their data is deleted, unless data handling is obligatory under other regulations (such as handling the data of employees).

4.4.2. In the case of digital direct marketing no such obligations exist, and data is deleted.

4.5. Personal data recorded as part of the operation of the websites:

- a) information regarding the computer system used by the user to access the services is automatically generated, collected and stored by the systems for technical purposes. Should this data be required for the proper functioning of the services this data is collected without the prior consent of the user.
- b) This information cannot be connected to personal data in any way, other than in select cases where legal obligations explicitly apply. This data is only accessible to the Data Handler.

4.6 Users may register on the website if they wish to leave comments and interact publicly with other Users and the Editors.

4.6.1. Data collected during registration:

- a) Username provided by the users which may or may not contain references to their personal name
- b) E-mail address provided by the user for administrative purposes
- c) Users may provide their personal name or link to a personal website or blog, this data is not compulsory.

4.6.2. The data provided for registration purposes is not used for direct digital marketing activities.

4.6.3. Users may delete their registration, and the data provided at any time by using the delete account option available from the login popup of the website.

4.7. Látóhatár Kiadó stores small data files, known as cookies, on the device of the user in order to provide the best experience and serve personalized content. The user can delete this cookie from their device or set up their browser to block all cookies. By blocking all cookies, the user accepts that the site may not function properly or to its full extent.

4.7.1. The Cookie Policy of the website, pestbuda.hu contains information on the cookies used, the data they collect and how long they are stored.

V. The rights of users:

5.1. The user has the following legal rights regarding the handling of their data:

- a) Right to information and access (what data is stored, whether data collection has happened);
- b) Right to rectification
- c) Right to erasure (only in cases where consent is the basis of the Data Handling)
- d) Right to restriction of processing;
- e) Right to object to the use of personal data for direct marketing purposes;
- f) Right to object to the sharing of personal data with a third party;
- g) Right of access to all personal data connected to the user processed by the Data Handler;
- h) Right to object against Data handling.

VI. The method of Data Handling

6.1. Látóhatár Kiadó handles all personal data in accordance with the ideas of sincerity, transparency and honesty, in line with effective regulations and the current Data Protection Notice.

6.2. Only the personal data required for the high-quality operation of the services provided are handled and processed based on the explicit and confirmed consent of our Users in for the goals laid out in the current Data Protection Notice.

6.3. Látóhatár Kiadó only handles and processes the personal data outlined in the current Data protection Notice and effective regulations for the goals laid out in the current Data protection Notice. Data processing is proportionate to the goals recorded and cannot exceed these.

6.4. In all cases, when Látóhatár Kiadó intends to use personal data for reasons other than for which that data was originally collected, the User shall be informed and given the opportunity to provide consent or refuse the data processing.

6.5. Látóhatár Kiadó is not responsible for the validity of personal data provided. Users are responsible for providing correct information.

VII. Personal Data Breaches

7.1. A Personal Data Breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

7.2. Látóhatár Kiadó ensures the required level of data security to safeguard the data it processes. In the case of a personal data breach Látóhatár Kiadó, its data protection officer, the data processor or its data protection officer shall inform the supervisory authority and effected users without undue delay, or within 72 hours.

7.3. Should a personal data breach occur Látóhatár Kiadó shall take all necessary steps to ensure the security of user data and close the security flaw which led to the personal data breach.

7.4. Effected users will be informed of steps taken and the results of these.

VIII. Right to lodge a complaint

8.1 Users are entitled to lodge a complaint with the following bodies:

- a. the Hungarian National Authority for Data Protection and Freedom of Information (postal address: 1530 Budapest, Pf.: 5.; address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; telephone: +36 (1) 391-1400; facsimile: +36 (1) 391-1410; e-mail: ugyfelszolgalat@naih.hu; web: <http://naih.hu>) and the
- b. local supervisory authority for data protection within the EEA

8.2. If the individual considers the processing of their personal data to be in violation of the provisions of the established legal regulations on privacy, especially those in the GDPR, they may lodge a complaint with any of the bodies above.

8.2.1. The decisions of the supervisory authority for data protection can be challenged in a court of law.

8.3. The User may turn to courts if their rights under the GDPR were violated. Deliberation of the lawsuit falls under the responsibility of the courts. If the individual's usual place of residence is in another member state of the EU, the individual may initiate the lawsuit before the court of such member state. Upon request the Data Controller shall provide information on the legal remedies available to Users.