

# Privacy Policy

This document provides information on the processing of personal data to CONTROL1.hu Kft., as data controller (hereinafter referred to as: Data Controller), the website operated by it, the www.control1.hu visitors and its customers.

## 1. Purpose of this document

The Data Controller's clients and those interested in its services (hereinafter referred to as: Data Subject) process their personal data in accordance with Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: Privacy Act), as well as 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 Directive 95/46/EC (hereinafter referred to as: Data Subject). 27 April) (hereinafter: Regulation, GDPR).

The Data Controller hereby informs the Data Subjects about the data processing, the personal data processed by it, the purpose of data processing, the retention period of the data, the method of storage and transmission, the principles and practices followed in the course of the processing of personal data, as well as the manner and possibilities of exercising the rights of the Data Subjects.

The Data Controller reserves the right to unilaterally amend this document at any time.

## 2. The Data Controller

Company name: Control1.hu Limited Liability Company Registered office: H-8142 Úrhida, Újszőlők út 20. Company registration number: Cg.07-09-031205 Tax number: 27990973-2-07E-mail: [tdobai@control1.hu](mailto:tdobai@control1.hu)

Represented by: Tamás Dobai managing director

### Contact details of the data protection contact:

E-mail: [info@control1.hu](mailto:info@control1.hu)

The company does not appoint a data protection officer based on its own internal decision, because it is not obliged to do so based on its activities related to data processing.

### 3. Data processing by the Data Controller during the use of the website

#### 3.1. Personal data processed in the course of contact, general inquiry

The Data Controller can be contacted through any communication channel and the processing of certain personal data of interested customers is essential for replying. The Company's website, [www.control1.hu](http://www.control1.hu), also contains a contact form during which personal data is processed.

**Purpose of data processing:** Answering the questions of interested parties

**Legal basis for the processing:** Article 6(1)(b) of the Regulation, i.e. the processing is necessary for the performance of a contract to which you are a party or for the performance of steps taken at your request prior to the conclusion of the contract.

Our Company considers communication to be the preliminary data processing related to a contract (agreement) to be concluded later, or the data processing related to an already concluded contract.

**Scope of data processed :** Name and contact details required for answering (e-mail address, phone number), as well as any other personal data provided by the customer

**Period of data retention:** If any kind of contract or agreement is concluded between our Company and you, we will process the personal data we become aware of in the course of communication in connection with the given contract, until the expiry of the limitation period at the latest.

If no contract or agreement is concluded between us and you after the data processing prior to the conclusion of the contract, we will delete your message(s) after the communication has been closed.

**Place of data processing:** IT devices located at the premises of the Data Controller or at the data processors used by the Data Controller.

**Method of data storage:** electronic.

**Data transfer:** no data affected by the data processing specified in this section will be transferred.

**Use of data processors:**

Processing	What personal data do you have access to? How can you use the given personal data (what activities do you perform for the Data Controller)?	How long can you store the data?
<b>Microsoft</b> One Microsoft Place, South County Business Park,	The operator of our email system, the communication via email goes through Microsoft servers.	while the Data Controller is using its system

Carmanhall And Leopardstown, Dublin, D18 P521, Ireland		
<b>DOCCA Outsource IT Zrt</b> Budapest, Győri út 2-C, 2nd floor 6, 1123	He performs a system administration service for our company, so he has full access to the data stored on the computers, so he can gain insight into the data during system maintenance.	As long as the data controller has a live contract with him
<b>Netezis Ltd.</b> Velence, Vásártér utca 20., 2481	The hosting provider of our website provides the infrastructure necessary for the operation of the site	As long as the data controller has a live contract with him

### 3.2. Cookies

When downloading certain parts of the control1.hu website, the web server automatically places small data files, so-called cookies ("Cookies", "Cookies") on the User's Device and reads them back during a subsequent visit. In some cases, these data files are subject to the provisions of the Infotv. or according to the GDPR, they are considered personal data, as the browser returns a previously saved cookie, and the service provider managing the cookie has the opportunity to link the User's current visit with the previous one, but only with regard to its own content.

During use, the website places a cookie on the user's device for the following purposes.

- **Necessary cookies**

Necessary cookies are essential for the basic functioning and security features of the website. Without them, the website would not be able to function properly, for example, it would not be able to remember the login status, the contents of the cart or the language settings. Users cannot disable these cookies without affecting the functionality of the website.

- **Functional cookies**

Functional cookies enable enhanced functionality and personalization of the website. These remember the user's choices, such as preferred language, region, or other settings, to provide a better and more personalized experience. Although the website remains usable without them, the user experience can be significantly reduced.

- **Analytical cookies**

Analytics cookies collect information about visitors' use of the website to help us understand how the user interacts with the site. These measure, for example, the number of visits, time spent on the site, the most popular content and navigation habits. The data collected is usually anonymous and is only used for statistical purposes in order to improve the website.

- **Advertising cookies**

Advertising cookies track a user's online behavior across different websites in order to show them relevant ads. These build profiles of users' interests and shopping habits. Advertising cookies enable targeted marketing campaigns and measure the effectiveness of ads.

- **Other cookies**

Other includes cookies that cannot be clearly classified into any of the above categories. These can be experimental features, development cookies, or special cookies from third-party services. They are usually temporary in nature or perform special technical functions that do not fit into the traditional cookie categories.

## Website cookies

Cookie name	Description	Duration	Type
pll_language	A cookie used by the Polylang plugin to remember the user's preferred language when visiting the website again	1 year	Necessary
_fbp	Facebook sets this cookie to store and track interactions	3 months	Advertisement
YSC	YouTube sets this cookie to track views of embedded videos	Session	Analytical
VISITOR_INFO1_LIVE	A cookie set by YouTube that measures bandwidth and determines whether the user receives the new or old player interface	6 months	Functional
VISITOR_PRIVACY_METADATA	YouTube sets this cookie to store the user's cookie consent status for the current domain	6 months	Necessary
__Secure-ROLLOUT_TOKEN	YouTube Security Token	6 months	Other

_GRECAPTCHA	This cookie is set by Google's reCAPTCHA service to identify bots to protect the website from malicious spam attacks	6 months	Necessary
__Secure-YEC	YouTube encrypted cookie	Past	Other
lastExternalReferrer	Store the last external referring page	Never	Other
lastExternalReferrerTime	Store the last external link time	Never	Other
_grecaptcha	Google reCAPTCHA cookie for bot protection	Never	Other
topicsLastReferenceTime	Store the last reference time of a topic	Never	Other
ytidb::LAST_RESULT_ENTRY_KEY	The cookie used by YouTube to store the last search result entry that the user clicked on. This information is used to improve the user experience by providing more relevant search results	Never	Functional
RC::A	This cookie is set by Google's reCAPTCHA service to identify bots to protect the website from malicious spam attacks	Never	Necessary
rc::f	This cookie is set by Google's reCAPTCHA service to identify bots to protect the website from malicious spam attacks	Never	Necessary

wpEmojiSettingsSupports	WordPress sets this cookie when a user interacts with emojis on the WordPress site. Helps determine if the user's browser can display emojis correctly	Session	Necessary
-167f244a-56f21746	YouTube session ID	Session	Other
iU5q-! O9@\$	YouTube session cookie	Session	Other
rc::b	This cookie is set by Google's reCAPTCHA service to identify bots to protect the website from malicious spam attacks	Session	Necessary
rc::c	This cookie is set by Google's reCAPTCHA service to identify bots to protect the website from malicious spam attacks	Session	Necessary

**Purpose of data processing:** identification and differentiation of users, identification of users' sessions

**Legal basis of data processing:** The legitimate interest of the data controller in the case of necessary cookies and the user's consent in the case of other cookies. The user can give their consent in the so-called "cookie banner" pop-up window.

**Scope of data processed:** identification number, date, time

**Method of data storage:** electronic.

**Data transfer:** no data transfer will take place.

#### 4. Other data processing by the Data Controller affecting clients

#### 4.1. Data processing by the Data Controller during the financial performance of the service (invoice issuance)

**Purpose of data processing:** Issuing invoices and receipts for purchases and services, and fulfilling the obligation related to the documentation of the Data Controller.

**Legal basis of data processing:** The legal basis of data processing is Section 169 (2) of the Accounting Act.

**Scope of processed data:** billing name, e-mail address, billing address (postal code, city, address),

**Period of data retention: according** to Section 169 (2) of the Accounting Act, the last day of the 8th year following the last day of the year in which the invoice was issued.

**Place of data processing:** IT equipment located at the Data Controller's premises, paper-based documents and invoices in the Data Controller's archives.

**Data transfer:** Invoices will be forwarded to the National Tax and Customs Administration

**Data processors used in the course of issuing invoices:**

Processing	What personal data do you have access to? How can you use the given personal data (what activities do you perform for the Data Controller)?	How long can you store the data?
<a href="http://Kboss.hu">Kboss.hu</a> Ltd 1031 Budapest, Záhony utca 7.	invoicing application operator, provides the infrastructure necessary for invoice preparation and storage	as long as you use your system for Data Controller invoicing
ÁGSZIL '97 Ltd. 1044 Budapest, Szilaspatak sor 46. Fsz.	He does the accounting of the company, so he has an insight into the data on the issued invoice	As long as the data controller has a contractual relationship with the data controller
DOCCA Outsource IT zrt 1124, Budapest, Apor Vilmos tér 25	You are the operator and maintainer of our IT systems, during which you have the technical opportunity to gain insight into the data stored on our computers.	As long as the data controller has a live contract with him

#### 4.2. Complaint handling

**Purpose of data processing:** To investigate, document and respond to customer complaints

**Legal basis of data processing:** Fulfilment of a legal obligation, pursuant to Section 17/A (7) of Act CLV of 1997 on Consumer Protection

**Scope of processed data:** billing name, e-mail address, phone number, billing address (postal code, city, address), delivery address (postal code, city, address)

**Period of data retention:** Copies of the minutes and transcripts of the objection and the reply thereto shall be kept for 3 years pursuant to Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

**Place of data processing:** IT equipment located at the Data Controller's premises, paper-based documents and invoices in the Data Controller's archives.

**Data transfer:** There is no automatic data transfer, but if the consumer protection authority conducts an inspection, the recorded complaints must be shown

**Data processors used:** none

#### **4.3. Personal data processed during the sending of the newsletter**

Section 3 (1) of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Commercial Advertising Activities (hereinafter: Advertising Act) Pursuant to Section 6 of the Data Protection Act, the User may give his/her prior and explicit consent to the Data Controller as a service provider contacting the User with advertising offers, other mailings, and the contact details provided by the Data Subject. In addition, the data subject may consent to the processing of the personal data necessary for the sending of advertising offers by the Data Controller, keeping in mind the provisions of this information.

The Data Controller shall not send unsolicited advertising messages, and the User may unsubscribe from receiving newsletters free of charge without restriction or justification. In this case, the Data Controller deletes all personal data necessary for sending advertising messages from its records and does not contact the User with further advertising offers. The User can unsubscribe from the newsletter in an e-mail message

**The purpose of data processing:** to send electronic e-mail messages containing advertisements to the data subject, to provide information about current information, products and promotions.

**The legal basis of data processing is** the voluntary, definite consent of the data subject based on appropriate information, which the User gives when subscribing to the newsletter, by ticking a tick box intended for this purpose, based on the information contained in this document. (Infotv. 5 (1) (a) and Article 6 (1) a) of the GDPR).

**Scope of processed data:** surname, first name, e-mail address.

**Retention period:** until the data subject's consent is withdrawn

**Place of data processing:** IT devices located at the premises of the Data Controller or at the data processors used by the Data Controller.

**Method of data storage:** electronic.

**Data transfer:** no data affected by the data processing specified in this section will be transferred.

**Data processors:**

<b>Processing</b>	<b>What personal data do you have access to? How can you use the given personal data (what activities do you perform for the Data Controller)?</b>	<b>How long can you store the data?</b>
<b>DiMa.hu Ltd.</b> 4032 Debrecen, Békessy Béla u. 9. Building C, 3rd floor, door 10	The infrastructure necessary for sending the newsletter is provided by the Dimail newsletter sending application, and the personal data of the newsletter subscribers are stored in their system.	as long as you use your system for Data Controller invoicing

## 5. Data security

The Data Controller respects the regulations on the security of personal data, so both the Data Controller and the authorized data processor take all the technical and organizational measures and establish the procedural rules that are necessary for the enforcement of the Privacy Act and the GDPR rules on confidentiality and data processing.

The Data Controller shall protect the data managed by it with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction or damage.

In the course of its data processing, the Data Controller retains:

- a) confidentiality: it protects information so that only those who are entitled to it can access it;
- b) integrity: it protects the accuracy and completeness of the information and the method of processing;
- (c) availability: ensures that the authorised user has access to the information they want when they need it and that the tools are available.

The Data Controller adequately protects its IT systems and networks against computer fraud, espionage, fire and floods, as well as viruses and computer break-ins. The operator ensures security with server-level and application-level protection procedures. The Data Controller monitors its systems in order to record all security incidents and provide evidence for all security incidents. System monitoring also makes it possible to check the effectiveness of the precautions taken. The Data Controller requires and monitors compliance with the information protection measures applied by the Data Controller on the basis of the provisions of the contracts concluded with the data processors used by the Data Controller.

## 6. Rights of data subjects and enforcement of rights

All personal information provided by the Data Subject to the Controller must be true, complete and accurate in all respects.

The data subject may request information about the processing of his or her personal data, and may request the correction of his or her personal data, or - with the exception of mandatory data

processing - their deletion or withdrawal, and may exercise their right to data portability and objection in the manner indicated at the time of recording the data, or at the above contact details of the data controller.

Right to information: The Data Controller shall take appropriate measures to provide the data subjects with all the information referred to in Articles 13 and 14 of the GDPR concerning the processing of personal data and each information pursuant to Articles 15-22 and 34 in a concise, transparent, intelligible and easily accessible form, in a clear and comprehensible manner.

The right to information may be exercised in writing through the contact details specified in Section 2 of this Notice. Upon request, the data subject may also be informed orally after verifying his or her identity.

Data subject's right of access: The data subject has the right to receive information from the controller as to whether his or her personal data is being processed and, if such processing is in progress, he or she has the right to access the personal data and the following information: the purposes of the processing; categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, including, in particular, recipients in third countries or international organisations; the planned duration of storage of personal data; the right to rectification, erasure or restriction of processing and the right to object; the right to lodge a complaint with a supervisory authority; information about data sources; the fact of automated decision-making, including profiling, as well as comprehensible information about the logic used and the significance of such processing and the expected consequences for the data subject. In the case of a transfer of personal data to a third country or to an international organisation, the data subject has the right to be informed of the appropriate safeguards for the transfer.

The Data Controller shall provide the data subject with a copy of the personal data subject to data processing. For additional copies requested by the data subject, the data controller may charge a reasonable fee adjusted to the administrative costs. At the request of the data subject, the Data Controller shall provide the information in electronic form. The data controller shall provide the information within a maximum of one month from the submission of the request.

Right to rectification: The data subject may request the rectification of inaccurate personal data processed by the Data Controller and the completion of incomplete data.

Right to erasure: The data subject is entitled to the deletion of personal data concerning him or her without undue delay by the Data Controller at his or her request if one of the following reasons exists:

- personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- the data subject withdraws his/her consent on the basis of which the data processing is based and there is no other legal basis for the data processing;
- the data subject objects to the data processing and there is no overriding legitimate reason for the data processing;
- the personal data has been unlawfully processed;

- the personal data must be erased in order to comply with a legal obligation imposed on the controller by EU or Member State law;
- personal data was collected in connection with the provision of information society services

The deletion of data may not be initiated if the data processing is necessary: for the purpose of exercising the right to freedom of expression and information; for compliance with an obligation under Union or Member State law to which the controller is processed, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; in the field of public health, archiving, scientific and historical research or statistical purposes, in the public interest; or to establish, exercise or defend legal claims.

Right to restriction of processing: At the request of the data subject, the Data Controller shall restrict the processing of data if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies to the period that allows the verification of the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use;
- the controller no longer needs the personal data for the purpose of data processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject objected to the data processing; In this case, the restriction applies to the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

Where processing is subject to restriction, personal data may only be processed, with the exception of storage, with the consent of the data subject 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. The Data Controller shall inform the data subject in advance of the lifting of the restriction of data processing.

Right to data portability: The data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format, and to transmit these data to another controller.

Right to object: The data subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of his or her personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or in the exercise of legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. In the event of an objection, the controller may no longer process the personal data, unless it is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or which are related to the establishment, exercise or defence of legal claims. If the processing of personal data is carried out for the purpose of direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him or her for this purpose, including profiling, insofar as it is related to direct marketing. In the event of an objection to the processing of personal data for direct marketing purposes, the data may not be processed for this purpose.

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 produces legal effects concerning him or her or similarly significantly affects him/her.

The above right shall not be applicable if the processing of data

- it is necessary for the conclusion or performance of a contract between the data subject and the data controller;
- it is made possible by Union or Member State law applicable to the controller, which also lays down appropriate measures for the protection of the rights and freedoms and legitimate interests of the data subject; or
- is based on the explicit consent of the data subject.

Right of withdrawal: The data subject has the right to withdraw his or her consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

Rules of procedure: The data controller shall inform the data subject of the measures taken in response to the request pursuant to Articles 15-22 of the GDPR without undue delay, but in any event within one month of receipt of the request. 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 data controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. If the data subject has submitted the application electronically, the information will be provided electronically, unless the data subject requests otherwise.

If the controller does not take action on 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 judicial remedy.

The Data Controller provides the requested information and information free of charge. If the data subject's request is clearly unfounded or excessive, in particular due to its repetitive nature, the controller may, taking into account the administrative costs involved in providing the requested information or information or taking the requested action, charge a reasonable fee or refuse to act on the request.

The controller shall inform all recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out by the controller, unless this proves impossible or requires a disproportionate effort. At the request of the data subject, the data controller shall inform the data subject about these recipients.

The data controller shall provide the data subject with a copy of the personal data subject to data processing. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. If the data subject has submitted the request electronically, the information will be provided in electronic format, unless the data subject requests otherwise.

Compensation and damages: Any person who has suffered material or non-material damage as a result of a violation of the Regulation is entitled to compensation for the damage suffered from the Data Controller or the Data Processor. The data processor shall only be liable for the damages caused by the data processing if it has not complied with the obligations set out in the law and specifically incumbent on the data processors, or if it has ignored or acted contrary to the lawful instructions of the data controller.

If several controllers or multiple processors, or both the controller and the processor, are involved in the same processing and are liable for any damage caused by the processing, each controller or processor shall be jointly and severally liable for the entire damage.

The data controller or the data processor shall be exempt from liability if it proves that it is not liable in any way for the event causing the damage.

Data protection authority procedure: The data subject may file a complaint with the National Authority for Data Protection and Freedom of Information in connection with the processing of his or her personal data

Name: National Authority for Data Protection and Freedom of Information

Headquarters: 1055 Budapest, Falk Miksa utca 9-11

Mailing address: 1363 Budapest, Pf.: 9.

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <https://www.naih.hu>

Right to turn to the court: In the event of a violation of his or her rights, the data subject may turn to the court against the data controller, regardless of the submission of the complaint. The court proceeds in the case out of turn.