# **GENERAL DATA PROCESSING REGULATION**

#### 1. The purpose of this document is to

1.1. outline the rules and actions regarding the collection, processing and protection of personal data collected by Premier Press Kiadó és Kereskedelmi KFT (Seat: 1223 Budapest, Memento Park, Balatoni út – Szabadkai utca, tax identification number: 12227460-2-43, business registration number: Cg.01-09-566237/5., bank account number: OTP Bank Nyrt. 11708001-20524418) (hereinafter: Controller).

We assure that we apply technical and organizational measures with the utmost care so that your personal data is protected in the best possible way. In particular, we protect your data against unauthorized access, as well as other cases of disclosure, loss or unauthorized modification.

- 1.2. The Controller respects the personal information and rights of Yours and treats the data in their possession only in the manner and to the extent you authorized the Controller or the applicable legal regulations allow.
- 1.3. Pursuant to the relevant provisions of the applicable legislation and the internal regulations of the Controller you consent to the recording, storing, managing and using your data in compliance with the referred legal regulations.
- 1.4. Providing personal data by you is voluntary. However, if you do not provide the data which are necessary, for example, to render certain services by us or provide you with a response to your request, it may prevent us from taking specific actions.
  - In addition, if you raise objections regarding the Controllers direct marketing, you will not be informed about our marketing activities.
- 1.5. Affected by this Privacy Statement and other regulations published by the Controller in accordance with its Visitor Rules, Job Description, Employment Contract, Customer Rules, Labor Protection Regulations, etc. by accepting or referring to the data contained in the regulations, you consent to the Controller's data processing as specified.
- 1.6. The data controller shall comply with the regulations and restrictions laid down by law in all cases when recording, storing and processing data.

#### 2. Personal data

- 2.1. Personal data is information that relates to an identified or identifiable individual. You should take into account the information you are processing together with all the means reasonably likely to be used by either you or any other person to identify that individual.
- 2.2. Personal data retains this quality during data processing as long as it can be linked to you (the data subject).

#### 3. The stored data

- 3.1. Some services provided by the Controller require registration or subscription with sharing some amount of personal details.
- 3.2. Via using websites operated by the Controller you agree that they gain some amount of your personal details.
- 3.3. The Controller during its business activity may get access to or collect personal data from a public database that stores personal data users previously agreed to transfer to a third party.
- 3.4. With sharing your personal information with the Controller, you agree that the Controller or a third party in charge of data processing a natural or a legal person can process and store your personal information.
- 3.5. The Controller operates a CCTV in its premises. The information on the operation of a CCTV is hanged on a visible surface at the main entrance. Entering the premises is your consent to the voice and video record.

#### 4. We process your personal data in order to

- 4.1. The purpose of the data management is to increase the efficiency, operational security, personal and property protection of the Controller's business activities, as well as to properly provide the service to be used by you. (Concerning the Controller's internet activity in particular.)
- 4.2. Pursuant to the relevant provisions of the applicable legislation, by providing your data you consent to handling and use your data for the purpose of market research, direct business acquisition or advertising. (Concerning databases built by the Controller in particular.)
- 4.3. Pursuant to the relevant provisions of the applicable legislation, you agree that accepting any of the regulations in clause 1.5, is your consent to recording, storing and using your personal data in electronic form by the Controller for life and property protection purposes. (Concerning the CCTV system operated by the Controller in particular.)
- 4.4. Pursuant to the relevant provisions of the applicable legislation, you agree that accepting the Controller's Job Description or Employment Contract is your consent for the Controller to record, store and use your data in electronic form for business purposes. (Concerning the Controller's business and communication activities in particular.)
- 4.5. In all cases where the Controller intends to use the provided data for a purpose other than the purpose of the original data collection, it shall inform you thereof and obtain your prior

consent, or provide you with an opportunity to prohibit the use.

### 5. Direct marketing

5.1. The Controller, in order to reach their business goals, may send DM-letters to people whose data is stored in the database. You, the owner of the data and the recipient of DM-letters, may unsubscribe without restriction and justification via e-mail: <a href="mailto:info@privateplanet.com">info@privateplanet.com</a>, or over the phone: +36 30 5000 925.

## 6. Processing data

- 6.1. Your data may be transferred to companies and authorities in legal connection with the Controller, such as: PayPal Inc, az OTP Bank Nyrt., a Nemzeti Mobilfizetési ZRt, a Nemzeti Adó- és Vámhivatal, N-Ware Kft. to conduct online transaction or for invoicing.
- 6.2. The data, recorded by the devices of the CCTV operated on the premises of and by the Controller, are stored and transferred on a password-protected communication channel. These data are only available for the person with authorization.
- 6.3. The Controller uses Google Analytics' web analytics services on its internet surfaces. For more information on how Google collects data via cookies, please visit: <a href="https://policies.google.com/technologies/cookies?hl=en-US">https://policies.google.com/technologies/cookies?hl=en-US</a>
- 6.4. The Controller is entitled and obliged by law to transfer any information stored legally on their devices to the competent authorities on request. The Controller is not responsible for any consequences of data transferring to legal authorities.
- 7. Cookies, web beacons and other anonymous information through using websites
  - 7.1. The Controller indicates that as a part of their activities, uses cookies. Cookie is a small piece of data stored on the user's computer by the web browser while browsing a website. Through cookies, the Controller observes and analyses traffic on their website (in particular for statistical and marketing purposes). As a part of these activities, the Controller does not process personal data to third parties in the understanding of the GDPR.
  - 7.2. You may set personal cookie preferences on the web browser.

## 8. Security

- 8.1. The Controller strives to protect the safety of the devices used for data storage and eliminate unauthorized access to your data stored in their database.
- 8.2. Your data is only available to a limited number of people bearing a uniquely identifiable access ("admin") The Controller regulates, registers, controls who, when and how got access to the stored data. These persons in charge shall treat data in strict secrecy.

8.3. Due to their Security Regulations, the Controller strives to eliminate manipulation, loss or unauthorized access to data on their technical devices. Your data to a third party will not be transferred.

### 9. Regulations of data processing

In connection with the processing of your personal data by us, you have the following rights:

- 9.1 The right to information about personal data processing
  - 9.1.1 you have the right to obtain from us, in particular, information about the purposes and grounds for personal data processing, the scope of data stored, entities to which they are transferred, and the planned date of data erasure.
- 9.2 The right to access your data and receive their copy
  - 9.2.1 you have the right to receive a copy of the data processed which concerns you.
- 9.3 the right to rectify (correct) personal data
  - 9.3.1 you have the right to request that the Controller shall remove incompatibilities or errors regarding your data, and demand them to be supplemented or updated if they turn out to be incomplete or out-of-date.
- 9.4 The right to restrict processing of personal data
  - 9.4.1 you have the right to demand that the Controller ceases to perform certain operations on your personal data.
- 9.5 The right to erase personal data
  - 9.5.1 you have the right to demand that the Controller erases data whose processing is no longer necessary for the purposes for which they have been collected (the so-called "right to be forgotten").
- 9.6 The right to data portability
  - 9.6.1 you have the right to obtain from the Controller personal data concerning you which you provided to the Controller on the basis of a contract or your consent, in a structured, commonly used machine-readable format,
  - 9.6.2 you can request the Controller to forward your data directly to another controller (if it is technically possible)
- 9.7 The right to object to the processing of personal data
  - 9.7.1 "marketing" objection you have the right to object to the processing of your data in order to conduct direct marketing; if you exercise this right the Controller will stop processing data for this purpose,
  - 9.7.2 objection in a specific case you also have the right to object to the processing of your data based on a legitimate interest for purposes other than direct marketing, and when processing is necessary for the Controller to perform a task carried out in the public interest or to exercise public authority entrusted to us. In this case, you should indicate to the Controller your specific situation which in your view justifies the cessation of processing covered by the objection. The Controller will stop

processing your data for these purposes, unless it demonstrates that the basis for processing of your data is superior to your rights, or that your data are necessary to us to establish, exercise or defend claims.

- 9.8 The right to revoke consent to the processing of personal data
  - 9.8.1 if personal data are processed on the basis of your consent, you have the right to revoke your consent at any time (revocation of your consent will not affect the lawfulness of the processing carried out prior to the revocation of your consent)
- 9.9 In order to exercise your rights referred to in points a) to (h) hereinabove, all correspondence should be sent via post or e-mail to the following address: Premier Press Kiadó és Kereskedelmi KFT, 1223 Budapest, Memento Park, Balatoni út Szabadkai utca or info@privateplanet.com. In addition, you can revoke your consent via the revocation form available on our website.

Your application should, if possible, precisely indicate the subject of the request. If the Controller is not able to identify the person submitting the application or determine the content of the request, will ask the applicant for additional information.

Before complying with your rights, the Controller will have to ensure that you are really you, i.e. identify you accordingly.

An application will be answered within one month of its receipt. If it becomes necessary to extend this deadline, the Controller will inform you of the reasons for such an extension.

### 10. Period of data storage

- 10.1. Without Your written consent, the Controller will store data until needed for the agreed purpose.
- 10.2. The data storage for safety of life and property is regulated by law that the Controller must respect.
- 10.3. Data will be stored from the day of collection until reasoned. The Controller guarantees that none of the stored data is associable with other personal user details, except for cases requested by law. If You withdraw the contribution to data usage, these details will only be identifiable for investigative bodies.

# 11. Judicial remedy

11.1. You may request information on personal data processing, ask rectification, canceling or blocking of her/his data, with exception of the compulsory data processing. You may object to the processing of her/his data due to the 21. § of the Law on Information. You may initiate an investigation with reference to a supposed or real thread for inappropriate personal data processing at the Hungarian National Authority for Data

Protection and Freedom of Information (http://naih.hu/; 1530 Budapest, Pf.: 5.; telefon: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu). If you believe that we are processing your personal data in violation of the provisions of the GDPR or other legal acts regulating personal data protection, you have the right to lodge a complaint to the President of the Office for Personal Data Protection.

### 12. Temporal scope

- 12.1 This GDPR is the recast and supplemented version of that created on January 22nd 2017 and is valid from March 31st 2021 until withdrawal.
- 12.2 The Controller upholds the right to change its GDPR unilaterally. Changes will be published on <a href="http://privateplanet.com/personaldata/">http://privateplanet.com/personaldata/</a> website 5 days prior to set in force.