

Privacy Policy - Sample

Purpose of the Privacy Policy

Studio Casa Kft. (Király utca 102., Budapest, 1068, hereinafter referred to as: Service Provider, Data Controller) as data controller, consents to be bound by the content of this Policy. Data Controller commits to ensure that any processing of data relating to its activities complies with the requirements set out in this Policy and in the applicable national legislation and European Union acts.

Data privacy guidelines relating to the Data Controller's data processing activities are available at www.immocto.com.

Data Controller reserves the right to change this Policy at any time. It will of course inform its audience of all changes in due time.

Should you have any questions about this Policy, please contact us and our team will answer them.

Data Controller is committed to protecting the personal data of its customers and partners, and considers the right of information self-determination of its customers to be particularly important. Data Controller treats personal data as confidential and takes all security, technical and organisational measures to ensure data security.

Data management practices of Data Controller are described below.

Data Controller's data

If you wish to contact Studio Casa Ltd., you can contact the Data Controller via info@immocto.com or via **+36-20-278-1822** phone number.

Data Controller will delete all received emails, along with the personal data, after a maximum of 5 years from the date of communication.

Name: **Studio Casa Kft.**

Address: **1068 Budapest Király utca 102.**

Company registration number: **01-09-906350**

Tax number: **14494635-2-42**

Phone number: **+36-20-278-1822**

E-mail: **info@immocto.com**

Data protection officer

Name: Szabó László

Phone number: +36-20-278-1822

E-mail: szabolaszlo@immocto.com

Scope of the processed personal data

Personal data to be provided when subscribing to the newsletter:

Name

E-mail

Personal data to be provided when requesting a quote

Name

E-mail

Technical information

During the course of providing its service Data Controller shall select and operate the IT tools used to process personal data ensuring that the processed data:

- is accessible to those authorised to access it (availability);
- its authenticity and authenticity are ensured (authenticity of data management);
- its integrity can be verified (data integrity);
- is protected against unauthorised access (data confidentiality).

Data Controller shall take appropriate measures to protect the data against unauthorised access, alteration, transmission, disclosure, erasure, intentional destruction and accidental destruction.

Data Controller shall ensure the security of data management by technical, organisational and institutional measures that provide a level of protection appropriate to the risks related to data processing.

Data Controller shall retain in the course of data processing

- confidentiality: it protects the information so that only those who are entitled to access can access it;
- integrity: it protects the accuracy and integrity of the information and the processing method;
- availability: it ensures that when the authorised user needs it, they have effective access to the information and the means to obtain it.

Cookies

Purpose of the cookies

- collect information about visitors and their devices;
- remember visitors' individual preferences which are used, for example, when visitors make online transactions, so they do not have to re-enter them
- facilitate the use of the website;
- provide a quality user experience.

In order to provide a personalised service, a small piece of data, i.e. a cookie, is stored on the user's computer and during a subsequent visit it is read. When the browser returns a previously saved cookie, the cookie provider has the possibility to link the user's current visit to previous visits, but only in relation to its own content.

Duration of data processing

Same as the storage period of the cookie, more information is available here:

Google general information about cookies:

<https://www.google.com/policies/technologies/types/>

Google Analytics information:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>

Facebook information:

https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen

Legal background and legal basis for cookies:

Pursuant to Article 6(1)(a) of the GDPR, the legal basis for data processing is the data subject's consent.

Main features of the cookies used by the website:

Strictly necessary cookies: These cookies are required in order for users to use our website and its main functions. Without these cookies you will not be able to use some of the features of our website. The lifetime of these types of cookies is limited to the duration of the session.

Cookies to improve your user experience: These cookies collect information about how users use our website, such as which pages of the website are visited most and what error messages are received from the website. These cookies do not collect any information that identifies the visitor, as they are completely generic and anonymous. We use the information they provide to improve the performance of the website. The lifetime of these types of cookies is limited to the duration of the session.

Third party cookies (analytics)

Google Adwords cookies: When someone visits our website, the visitor's cookie ID is added to the remarketing list. Google uses cookies - such as NID and SID cookies - to personalise the ads you see in Google products, such as Google Search. It uses such cookies, for example, to remember your recent searches, your previous interactions with advertisements from individual advertisers or search results, and your visits to advertisers' websites. The AdWords conversion tracking feature uses cookies. To track ad sales and other conversions, cookies are saved on a user's computer when they click on an ad. Some common uses of cookies include: selecting ads based on what is relevant for a particular user, improving campaign performance reporting, and avoiding displaying ads that the user has already seen.

Google Analytics cookie: Google Analytics is Google's analytics tool that helps website and app owners to get a more accurate picture of their visitors' activities. The service may use cookies to collect information and report statistics about website usage without identifying visitors individually to Google. The cookie primarily used by Google Analytics is the "__ga" cookie. In addition to generating reports from website usage statistics, Google Analytics, along with some of the advertising cookies described above, may also be used to display more relevant ads in Google products (such as Google Search) and across the web.

Google Tag Manager cookies

Search Console cookies

Remarketing cookies: These may appear when previous visitors or users are browsing other sites on the Google Display Network or searching for terms related to their products or services.

Session cookies: These cookies store the location of the visitor, the language of the browser, the currency of the payment, and their lifetime ends at the closing of the browser or after 2 hours.

Mobile version, design cookie: Detects the device used by the visitor and switches to full view on mobile. Lifetime is 365 days.

Cookie acceptance cookie: When arriving on the site, it accepts the cookie storage statement in the warning window. Lifetime is 365 days.

Facebook pixel (Facebook cookie): A Facebook-pixel is a code that allows the website to report conversions, create audiences and provide the website owner with detailed analytics on how visitors use the site. The Facebook pixel is used to display personalised offers and ads to website visitors on Facebook. You can read Facebook's privacy policy here:

<https://www.facebook.com/privacy/explanation>

In case you do not accept cookies, some functions will not be available for you. You can find further information on deleting cookies on the below links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Mozilla: <https://support.mozilla.org/hu/kb/weboldalal-altal-elhelyezett-sutik-torlese-szamito>
- Safari: https://support.apple.com/kb/ph21411?locale=en_US
- Chrome: <https://support.google.com/chrome/answer/95647>

Personal data to be provided when requesting an online quote

Name:

E-mail:

Personal data related to newsletters

Name:

E-mail:

Data processing activities related to sending newsletters

Name of company operating the newsletter mailing system: : MailChimp c/o The Rocket Science Group, LLC

Registered office of the company operating the newsletter mailing system: 675 Ponce De Leon Ave NE, Suite 5000

Phone number of the company operating the newsletter mailing system: +800 315 5939

E-mail address of the company operating the newsletter mailing system: info@mailchimp.com

The Data Processor cooperates with Data Controller in sending newsletters based on the contract between them. In this process the Data Processor processes the name and e-mail address of the data subject to the extent necessary to send the newsletter.

Options for subscribing and unsubscribing to the newsletter, providing an unsubscribe option.

You can subscribe to the newsletter on the immocto.com website. Unsubscribing from the newsletter is possible via the link in the newsletter.

Purpose, method and legal basis of data processing

General guidelines for data processing

Data Controller's data processing activities are based on voluntary consent or on legal authorisation. In the case of voluntary consent, data subjects may withdraw their consent at any stage.

In certain cases the managing, storage and transmission of some of the data provided is required by law, of which our customers will be specifically notified.

Users providing data shall note that if they provide personal data other than their own, it is the data provider's obligation to obtain consent from the data subject.

Data processing principles comply with the applicable data protection legislation, in particular with:

- Act CXII of 2011 of Hungary on the Right of Informational Self-Determination and on Freedom of Information
- General Data Protection Regulation of the European Union on data processing. (Regulation of the European Parliament and the Council (EU) 2016/679, (27/04/2016) 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;
- Act V of 2013 of Hungary on the Civil Code
- Act C of 2000 of Hungary on Accounting
- Act LIII of 2017 Prevention and Combating of Money Laundering and Terrorist Financing (“Anti-Money Laundering Act”)
- Act CCXXXVII of 2013 of Hungary on Credit Institutions and Financial Enterprises.

Physical locations of data storage

Your personal data, (i.e. data that can be linked to someone personally) may be processed by us in the following ways: Technical data about the computer, browser, Internet address and pages visited in connection with the Internet connection are automatically generated in our computer system. On the other hand, you may provide us with your name, contact details or other data if you wish to contact us personally when using the website.

Data transmission, data processing, and the scope of persons with access to data

Itemised list of companies that transmit, store and know the data. List of the data and contact details of the companies concerned (e.g. accounting, invoicing, delivery of goods, CRM system, online payment, etc.)

Hosting service

WP Online Magyarország Kft.
Balázs Béla utca 15-21 D204, Budapest, 1094
+3630 3264612
office@wpo.hu

Based on the contract concluded between the Data Processor and the Data Controller, the Data Processor assists in the registration of orders.

During this process the Data Processor will process the name, address, telephone number and number and date of orders of the data subject within the limitation period under civil law.

Rights of the data subject and legal remedies

During the period of the data processing, you have the following rights under the Regulation:

- Right to withdraw consent
- Right to access personal data and information about data processing
- Right to rectification
- Right to restriction of processing
- Right to erasure
- Right to object
- Right to data portability

If you wish to exercise your rights, it will involve identifying yourself and Data Controller will need to communicate with you. For this purpose, identification will require the provision of personal data (but identification may only be based on data that Data Controller already holds about you) and your

complaints about the processing will be available on Data Controller's email account within the time period specified in this Policy in relation to complaints. If you have been a customer of ours and would like to be identified for the purposes of complaint handling or warranty handling, please also provide your order number for identification purposes. This will be used to identify you as a customer.

Data Controller will respond to complaints about data processing within 30 days at the latest.

Right to information

Data Controller shall take appropriate measures to provide data subjects with all the information referred to in Articles 13 and 14 of the GDPR and each of the disclosures referred to in Articles 15 to 22 and 34 of the GDPR concerning the processing of personal data in a concise, transparent, and easily understandable and accessible form, in clear and plain language.

Data subject's right to access

You have the right to receive feedback from Data Controller as to whether or not personal data concerning you is being processed, and, where that is the case, you have the right to:

- Be provided access to the personal data being processed and
- To be informed by Data Controller of the following information:
 - the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipients to whom the personal data have been or will be disclosed by Data Controller;
 - where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
 - the existence of the right to request Data Controller to rectify, erase or restrict the processing of your personal data and, in the case of processing based on legitimate interest, to object to the processing of such personal data;
 - your right to file a complaint with the supervisory authority
 - If the personal data are not collected from you, any available information about its source;
 - The existence of automated decision making (if such process is used), including profiling, and in those cases clear information about at least the applied logic and the significance and the envisaged consequences of such processing for you.

The purpose of exercising this right is to determine and verify the lawfulness of the data processing, and Data Controller may charge reasonable compensation for the provision of information in the event of repeated requests for information.

Access to personal data is provided by Data Controller by sending you the personal data and information processed via email once you have identified yourself. If you have a registered account the access will be provided in your account so you can view and verify the personal data we process about you by logging into your account.

You must indicate in your request whether you are requesting access to your personal data or requesting information about data processing.

Right to rectification

You have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning you, upon your request.

Right to erasure

The data subject shall have the right to obtain from Data Controller the erasure of personal data

concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

The right to be forgotten will not apply where processing is necessary for: Exercising the right of freedom of expression and information; Compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; Reasons of public interest in the area of public health, archiving purposes, scientific or historical research purposes or statistical purposes; for the establishment, exercise or defence of legal claims.

Right to restriction of processing

The data subject shall have the right to obtain from Data Controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent 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.

Right to data portability

Where the processing is carried out by automated means, or the processing is based on your consent you have the right to receive the personal data concerning you which you have provided to Data Controller, in XML, JSON or CSV format where technically feasible you have the right to have the personal data transmitted directly from one controller to another.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Automated individual decision-making, including profiling

The data subject shall have 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 or her.

Right to withdraw consent

The data subject shall have the right to withdraw consent to data processing at any time.

Right to legal remedy

The data subject shall have the right to turn to court if his or her rights are infringed. The court shall rule on the case out of turn.

Data Protection Authority official procedure

You can lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information:

- Name: Hungarian National Authority for Data Protection and Freedom of Information
- Registered office: Szilágyi Erzsébet fasor 22/C. ,Budapest, 1125
Postal address: PO Box 5. , Budapest, 1530
- Phone: +361 3911400
- Fax: +361 3911410
- E-mail: ugyfelszolgalat@naih.hu
- Website: <http://www.naih.hu>

Miscellaneous provisions

Information on data processing not listed in this notice is provided at the time of collection.

We inform our customers that the court, the prosecutor, the investigating authority, the law enforcement authority, the administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information, the Hungarian National Bank, or other bodies authorised by law may contact Data Controller to provide information, to disclose or transfer data, or to provide documents.

Data Controller shall only disclose to the authorities - if the authorities have indicated the precise purpose and scope of the data - personal data to the extent that is strictly necessary for the purpose of the request.

This document contains all relevant information on data processing in relation to the operation of the **website** in accordance with the 2016/679 General Data Protection Regulation of the European Union (hereinafter referred to as the Regulation. GDPR) and the (Hungarian) Act CXII of 2011 (hereinafter referred to as the Infotv.).