

Privacy Notice for Customers

1. Az Adatkezelő megnevezése

Adatkezelő megnevezése:	Dunai Sétahajózási Kft.
Adatkezelő cégjegyzékszám:	01-09-388532
Adatkezelő székhelye:	1036 Budapest, Perc utca 2.
Adatkezelő e-elérhetősége:	www.dunacruises.com
Adatkezelő képviselője:	Fogasy Gergely
Adatvédelmi tisztviselő:	Fogasy Gergely
E-mail cím:	fogasyg@gmail.com

On behalf of Dunai Sétahajózási Kft. (hereinafter referred to as the "Data Controller"), we inform you that the service activity:

In connection with the provision of the service, your personal data will be processed as follows:

With this information, the Data Controller wishes to ensure the provision of the information to the data subject as defined in Article 12 of the GDPR

The purpose of this GDPR is to ensure the exercise of the right to information on the processing of personal data, as laid down in Article 12 of the GDPR. The purpose of the information notice is to provide data subjects with adequate information about the Data Controller's activities in accordance with the 12th Directive of the GDPR. The data processed by the controller or by a processor to whom the controller has delegated the processing, the source of the data, the processing the purpose, legal basis and duration of the processing, the name and address of any data processor involved in the processing and the and the activities of the controller in relation to the processing and, in the case of a transfer of personal data of the data subject, the
the legal basis and the recipient of the transfer.

By means of the information notice, the Data Controller intends to ensure the lawful operation of the registers, the protection of personal data the constitutional principles of data protection, data security, and to prevent unauthorised access to data unauthorised access to, and unauthorised alteration or disclosure of, the Data.

1. Rules on data processing

Since informational self-determination is a fundamental right of every natural person under the Fundamental Law, the Data Controller shall process data only and exclusively in accordance with the provisions of the applicable legislation.

Personal data may only be processed for the exercise of a right or the performance of an obligation. The use of personal data processed by the Controller for private purposes is prohibited. The processing must always comply with the purpose limitation principle.

The Data Controller shall process personal data only for specified purposes, for the exercise of rights and for the performance of obligations, to the extent and for the minimum time necessary to achieve those purposes. At all stages of processing, the purpose must be fulfilled - and if the purpose of the processing ceases to exist or the processing is otherwise unlawful, the data will be deleted.

Deletion is carried out by the Data Controller's employee who actually processed the data. The erasure may be verified by the person who effectively exercises the powers of an employer over the employee and by the Data Protection Officer.

The Data Controller shall process personal data only with the prior consent of the data subject or, in the case of special categories of personal data, on the basis of a written consent or on the basis of a law or a legal authorisation. The Data Controller shall in any case inform the data subject of the purposes of the processing and the legal basis for the processing before the data are collected.

2. Enforcement of data subjects' rights

The data subject may request information about the processing of his or her personal data, as well as the rectification, erasure or restriction of his or her personal data, except for processing required by law, at the contact details of the Data Controller.

The data subject shall have the right to obtain the personal data relating to him or her which he or she has provided to the controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller.

The Controller shall transmit the request or objection received to the head of the department responsible for the processing within three days of receipt.

The head of the department responsible for the processing of personal data shall reply in writing and in an intelligible form to the request in relation to the processing of the personal data of the data subject within 25 days of receipt at the latest, or 15 days in the case of the exercise of the right to object.

At the data subject's request, the controller shall provide information on the data of the data subject processed by the controller or by a processor to whom the controller or the processor has delegated the processing, the source of the data, the purpose, legal basis and duration of the processing, the name and address of the processor and the activities of the processor in relation to the processing, the circumstances of the personal data breach, its effects and the measures taken to remedy it, and, in the case of a transfer of the data subject's personal data, the legal basis and the recipient of the transfer.

The information shall, as a general rule, be provided free of charge if the person requesting the information has not yet submitted a request for information to the Data Controller for the same set of data in the current year. In other cases, a fee may be charged. The amount of the fee may be fixed in a contract between the parties. Any compensation already paid shall be refunded if the data have been unlawfully processed or if the request for information has led to a rectification.

The head of the department processing the data shall correct the inaccurate data, provided that the necessary data and the supporting documents are available, and, if the grounds set out in Article 17 of the GDPR apply, shall arrange for the erasure of the personal data processed.

Personal data must be deleted if:

- A. the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- B. the data subject withdraws the consent on the basis of which the processing was carried out and there is no other legal basis for the processing;
- C. the data subject objects to the processing and there is no overriding legitimate ground for the processing or the data subject objects to the processing;
- D. the personal data have been unlawfully processed;
- E. the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- F. personal data have been collected in connection with the provision of information society services to children under the age of 16;
- G. where the controller has made the personal data public and the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, it must erase them and take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to or copies or replicas of the personal data in question.

The data subject may object to the processing of his or her personal data,

- if the processing or transfer of the personal data is necessary solely for compliance with a legal obligation to which the Controller is subject or for the purposes of the legitimate interests pursued by the Controller, the recipient or a third party, except in cases of mandatory processing;
- where the personal data are used or transmitted for direct marketing, public opinion polling or scientific research purposes; and
- in other cases provided for by law.

The Data Controller shall examine the objection, decide whether it is justified and inform the applicant in writing of its decision within the shortest possible time from the date of the request, but not later than 15 days.

If the Data Controller establishes that the objection of the data subject is justified, the Data Controller shall terminate the processing, including further recording and transmission of the data, block the data and notify the objection and the measures taken on the basis of the objection to all those to whom the personal data concerned by the objection have been transmitted and who are obliged to take action to enforce the right to object.

If the data subject disagrees with the decision of the controller or if the controller fails to respond within the time limit, the data subject may, within 30 days of the notification of the decision or the last day of the time limit, have recourse to the courts. If the data subject does not receive the data necessary to exercise his or her rights because he or she objects, he or she may, within 15 days of the notification, take legal action against the Controller in order to obtain access to the data.

The Controller may also bring legal proceedings against the data subject. If the Data Controller fails to give the notification, the data subject may request the Data Controller to provide information on the circumstances surrounding the failure to provide the data, which the Data Controller shall provide within 8 days of the service of the data subject's request.

In the event of a request for clarification, the data subject may bring an action against the Controller before a court within 15 days of the date of the request for clarification, but no later than the expiry of the time limit for the provision of clarification. The Controller may also bring legal proceedings against the data subject.

The Controller may not delete the data of the data subject if the processing is required by law. However, the data may not be transferred to the data recipient if the controller has consented to the objection or if the court has ruled that the objection is justified.

If the assessment of the case is unclear in the exercise of the data subject's rights, the head of the department processing the data may request the DPO to give his or her opinion on the case by sending the file and his or her position on the case, and the DPO shall do so within three days.

The Data Controller shall also compensate any damage caused to another person by unlawful processing of the data subject's data or by a breach of data security requirements, as well as any damages for personal injury caused by the Data Controller or by a data processor engaged by the Data Controller.

The Data Controller shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that the damage or the infringement of the data subject's personality rights was caused by an unavoidable cause outside the scope of the processing. Likewise, it shall not compensate the damage if it was caused by the intentional or grossly negligent conduct of the injured party. The data subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/C., 1125 Budapest) or with the competent court of law of his/her place of residence or domicile.

3. Data processing in the course of the Controller's operations

Place of processing: 1036 Budapest, Perc utca 2.

3.1 Data processing related to arrears management

The processing of arrears incurred by the Data Controller is carried out by its own employees. The Data Controller sends payment notices to the data subjects with arrears.

- **Data management registration number:** with the application of the GDPR, the NAIH's registration of data management processes ceased to exist, replaced by the obligation for the controller to keep records within its own organisation
- **Purpose of processing:** processing of data of data subjects in arrears for the purposes of arrears management: name, address, telephone number of the arrears holder
- **Legal basis for processing:** pursuit of a legitimate corporate interest within the meaning of Article 6(1)(f) of the GDPR time limit for storage: payment of the arrears or limitation period for civil claims relating to the arrears (5 years)
- **Method of storage:** electronic

3.2. Data management in relation to complaint handling

Data subjects have the possibility to lodge complaints in connection with the Data Controller's service activities. Complaints can be made in person, by post, by telephone or by e-mail.

Oral complaints will be promptly investigated by the Data Controller and remedied as necessary. If the customer does not agree with the handling of the complaint or if it is not possible to investigate it

immediately, a record of the complaint will be made, a copy of which will be given to the guest. The record of the complaint shall include the following:

- A. the name of the customer;
- B. the customer's address, registered office and, where applicable, postal address;
- C. the place, time and manner in which the complaint was lodged;
- D. a detailed description of the customer's complaint, with a separate record of the objections to which the complaint relates, in order to ensure that all the objections contained in the customer's complaint are fully investigated;
- E. a list of documents, records and other evidence produced by the customer;
- F. the signatures of the person who took the minutes and the customer (the latter formality is required in the case of a face-to-face oral complaint);
- G. the place and time when the record was taken.

Data management registration number: with the application of the GDPR, the NAIH's registration of data management processes ceased to exist, replaced by the obligation for the controller to keep records within its own organisation

Purpose of data processing: registration of customer complaints, handling of complaints related to service activities

Scope of data processed: name of customer, address/address of customer, postal address, telephone number, method of notification, service complained about, description of the complaint, reason for the complaint, the complainant's claim, copies of documents in the customer's possession which are not available at the Data Controller, other data necessary for investigating and responding to the complaint

Legal basis for processing: the data subject's consent pursuant to Article 6(1)(a) of the GDPR and Article 17/A(6)-(7) of Act CLV of 1997 on Consumer Protection

Data retention period: the Data Controller shall keep the record of the complaint and a copy of the reply for 5 years and shall submit it to the supervisory authorities upon request [Article 17/A(7) of the Consumer Protection Act]

Data retention method: electronic and paper-based 5.

4. Image and video recordings

The Data Controller may take pictures and video recordings both on its scheduled and programme boats and at its individually commissioned events. By purchasing a ticket or ordering an event organised by the Data Controller, the Customer consents to the taking of pictures and video recordings on the vessels of the Dunai Sétahajózási Kft. and to their use and display for advertising purposes. If the Customer does not wish to consent to the appearance of the photos and videos, he/she must personally inform the Data Controller or the personnel acting on behalf of the Data Controller, in this case the crew of the Data Controller's cruises or the photographer participating in the programme, at the latest before the departure of the boat.

For matters not covered by this notice, Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) shall apply.

DATA PROCESSING RELATED TO THE OPERATION OF THE SERVICE

1. The fact of collection, the scope of the data processed and the purpose of the processing:

Personal data	Purpose of processing
E-mail address	To keep in touch, send confirmations, send electronic invoices.
Surname and first name	For contact, purchase and correct invoicing required for contacting us.

The e-mail address does not need to contain any personal data.

2. **Data subjects:** anyone who makes a purchase on the website.

3. **Duration of data processing, deadline for deletion of data:** The controller will inform the data subject electronically of the deletion of any personal data provided by the data subject in accordance with Article 19 of the GDPR. If the data subject's request for erasure also includes the e-mail address provided by the data subject, the controller will also erase the e-mail address following the notification. Except in the case of accounting records, since pursuant to Article 169 (2) of Act C of 2000 on Accounting, these data must be kept for 8 years.

The accounting documents (including general ledger accounts, analytical or detailed records) which directly and indirectly support the accounting accounts must be kept for at least 8 years in a legible form, retrievable by reference to the accounting records.

4. **Identity of potential controllers and recipients of personal data:** personal data may be processed by the controller and by processors, in compliance with the principles set out above.

5. **The data subjects' rights in relation to the processing of personal data:**

The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and the data subject has the right to data portability and the right to withdraw consent at any time.

6. **The data subject may request access to, erasure, rectification or restriction of processing of personal data and portability of the data in the following ways:**

- by e-mail to info@dunacruises.com

7. **Legal basis for the processing:**

7.1 GDPR Article 6(1)(b),

7.2. Article 13/A (3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (hereinafter referred to as "Elker Act"):

The service provider may process personal data that are technically necessary for the provision of the service. The provider must, other things being equal, choose and in any event operate the means used in

the provision of the information society service in such a way that personal data are processed only to the extent strictly necessary for the provision of the service and for the fulfilment of the other purposes laid down in this Act, but even then only to the extent and for the duration necessary.

7.3. If an invoice is issued in accordance with accounting legislation, Article 6(1)(c).

7.4. In the event of enforcement of claims arising from the contract, 5 years pursuant to § 6:21 of Act V of 2013 on the Civil Code.

§ 6:22 [Limitation period]

(1) Unless otherwise provided by this Act, claims shall be time-barred after five years.

(2) The limitation period shall begin to run when the claim becomes due.

(3) An agreement to change the limitation period shall be in writing.

(4) An agreement excluding the limitation period is void.

8. Please note that:

- A. the processing is necessary for the performance of a contract.
- B. You are obliged to provide personal data in order for us to fulfil your order.
- C. failure to provide the data will result in our inability to process your order.

THE DATA PROCESSORS USED

Hosting provider

1. Activity performed by the data processor: Hosting
2. Name and contact details of the data processor:
 - Name: Microsoft Ireland Operations Ltd
 - Address: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland
 - Contact: <https://privacy.microsoft.com/hu-hu/privacy-questions>
3. The fact of processing, the scope of the data processed: all personal data provided by the data subject.
4. Data subjects: all data subjects using the website.
5. Purpose of data processing: to make the website available and to ensure its proper operation.
6. Duration of data processing, time limit for erasure of data: until the termination of the agreement between the controller and the hosting provider or until the data subject's request for erasure to the hosting provider.
7. Legal basis for the processing of the data: Article 6(1)(f) GDPR and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.
8. Rights of the data subject:
 - A. You may be informed of the circumstances of the processing,

- B. You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- C. You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- D. You have the right to have inaccurate personal data corrected by the controller without undue delay at your request.
- E. You may object to the processing of your personal data.

Website operation

1. Activity carried out by the processor: website maintenance (monitoring, technical updates, security system development, other developments, repair tasks)
2. Name and contact details of the data processor:
Name: **Viktor Czeglédi**
Address: **1225 Budapest Csút utca 10/A 3/13**
E-mail: **info@mxsoftware.it**

Name: **Botond Mátyus**
Address: **2117 Isaszeg, Mátyás király utca 28**
E-mail: **info@mxsoftware.it**
3. The fact of processing, the scope of the data processed: all personal data provided by the data subject.
4. Data subjects: all data subjects who use the services of the website and all data subjects who have registered/purchased/booked on the website.
5. Purpose of data processing: to make the website available and to ensure its proper operation.
6. Duration of data processing, deadline for deletion of data: until the termination of the agreement between the Service Provider and the website operator or until the data subject's request for deletion to the website operator.
7. Legal basis for data processing: Article 6(1)(f) of the GDPR and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.
8. Rights of the data subject:
 - You may be informed of the circumstances of the processing,
 - You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
 - You have the right to receive your personal data in a structured, commonly used, machine-readable format.
 - You have the right to have inaccurate personal data corrected by the controller without undue delay at your request.
 - You may object to the processing of your personal data.

Billing

1. Activity performed by the processor: invoicing
2. Name and contact details of the data processor:
Name: (Számlázz.hu) KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (KBOSS.hu Kft.)
Registered office: 1031 Budapest, Záhony utca 7.
1010 103310.HU, Budapest, Hungary
E-mail: info@szamlazz.hu
3. The fact of processing, the scope of the data processed: Name, billing name, billing address.
4. Data subjects: all data subjects placing an order on the website.
5. Purpose of processing: electronic invoicing/bookkeeping tasks
6. Duration of processing, deadline for deletion of data: 8 years pursuant to Article 169 (2) of Act C of 2000 on Accounting.
7. Legal basis for data processing: Article 6(1)(c) GDPR and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.
8. Rights of the data subject:
 - You may be informed of the circumstances of the processing,
 - You have the right to receive feedback from the controller on whether your personal data are being processed and to access all information relating to the processing.
 - You have the right to receive your personal data in a structured, commonly used, machine-readable format.
 - You have the right to have inaccurate personal data corrected by the controller without undue delay at your request.

Online marketing services, notifications

1. Activity performed by the data processor: online marketing
2. Name and contact details of the data processor:
Name: SendGrid, Inc.
Address: 1801 California St., Suite 500, Denver, CO 80202, U.S.A.
Web: <https://sendgrid.com>
3. Fact of processing, scope of data processed: name, e-mail address, visitor data
4. Data subjects: all data subjects who use the website and subscribe to the newsletter.
5. Purpose of data processing: Promotion and advertising of the products available on the website, the website, increase the number of visitors.

6. Duration of processing, deadline for deletion of data: until the termination of the agreement between the Service Provider and the data processor referred to in this point or until the data subject's request for deletion to this data processor.
7. Legal basis for data processing: the consent of the User, the legal basis for the processing of the data in accordance with the Infotv. Article 5(1), Article 6(1)(a) and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.
8. Rights of the data subject:
 - You may be informed of the circumstances of the processing,
 - You have the right to receive feedback from the controller on whether your personal data are being processed and to access all information relating to the processing.
 - You have the right to receive your personal data in a structured, commonly used, machine-readable format.
 - You have the right to have inaccurate personal data corrected by the controller without undue delay at your request.

THE RECIPIENTS TO WHOM THE PERSONAL DATA ARE DISCLOSED (DATA SUBJECTS):

Online payment

1. Activity performed by the Recipient: online payment

2. Name and contact details of the Recipient:

Name: PayPal

Web: www.paypal.com

Name: (SimplePay) OTP Mobil Kft.

Registered office: 1093 Budapest, Közraktár u. 30-32.

Website: <https://simplepay.hu>

Name: BIG FISH INTERNET- TECHNOLOGICAL COMPANY

Headquarters.

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

3. Fact of processing, scope of data processed: billing data, name, e-mail address

4. Data subjects: all data subjects who choose to pay via PayPal or SimplePay on the website.

5. Purpose of the processing: to process online payments, confirm transactions and carry out fraud-monitoring to protect users.

6. Duration of processing, deadline for deletion of data: It takes until the online payment is processed

7. Legal basis for data processing: article 6(1)(b) GDPR. The legal basis is necessary to complete the online payment at the request of the data subject.

8. Rights of the data subject:

- You can be informed about the circumstances of the processing,
- You have the right to receive feedback from the controller on the processing of your personal data and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- You have the right to have inaccurate personal data corrected by the controller without undue delay at your request.

9. Other information. Online purchases are processed through the payment service providers' system. The personal data and credit card details provided when placing an order are transmitted to the payment service providers' servers. The personal data transmitted in this way will be processed by the payment service provider in accordance with its Privacy and Data Protection Policy.

COOKIE MANAGEMENT (COOKIES)

1. Fact of processing, scope of data processed: unique identifier, dates, times
2. Data subjects: All data subjects visiting the website.
3. Purpose of the processing: Identifying users, tracking visitors
4. Duration of data processing, deadline for deletion of data:

Type of the cookie	Legal basis for data processing	Duration of processing	Data processed
Session cookies	The electronic trade services, and the information society services 2001. CVIII.(Elkertv.) § 13/A (3)	Lasts until the end of the relevant visitor session	connect.sid
Permanent or saved cookies	The electronic trade services, and the information society services 2001. CVIII.(Elkertv.) § 13/A (3)	Until the deletion of the data subject	

5. Identity of the potential data controllers who may access the data. Using cookies, the data controller does not use personal data.

6. The data subject is informed about the privacy settings.

7. The sole purpose of the use of cookies is the transmission of communications over an electronic communications network or for the purposes of the subscriber or the use of cookies for the provision of an information society service expressly requested by the subscriber or user is not necessary for the purposes of the cookie is strictly necessary for the provision of a service expressly required by the service provider.

USE GOOGLE ADWORDS CONVERSION TRACKING

1. The data controller uses the online advertising program "GoogleAdWords" and makes use of Google's conversion tracking service within its framework. Google Conversion Tracking is an analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").
2. When you access a website through a Google ad, a cookie is placed on your computer for conversion tracking. These cookies have a limited validity and do not contain any personal data, so the User cannot be identified by them.
3. When the User browses certain pages of the website and the cookie has not expired, Google and the data controller can see that the User has clicked on the ad.
4. Each GoogleAdWords client receives a different cookie, so they cannot be tracked through AdWords clients' websites.
5. The information obtained through the conversion tracking cookies is used to generate conversion statistics for AdWords customers who opt for conversion tracking. Clients are then informed of the number of users who click on their ad and are referred to a page with a conversion tracking tag. However, they do not have access to information that would allow them to identify any user.
6. If you do not wish to participate in conversion tracking, you can opt out by disabling the option to set cookies in your browser. You will then not be included in the conversion tracking statistics.
7. For more information and to read Google's privacy statement, please visit www.google.de/policies/privacy/

THE GOOGLE ANALYTICS APPLICATION

1. This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). GoogleAnalytics uses so-called "cookies", text files that are saved on your computer to help the website analyze how users use the website.
2. The information generated by the cookie about the website you use is usually transmitted to and stored by Google on servers in the United States. By activating the IP anonymisation on the website, Google will previously shorten the User's IP address within the Member States of the European Union or in other states party to the Agreement on the European Economic Area.
3. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity for the website operator and to provide other services relating to website activity and internet usage.
4. Google Analytics will not associate the IP address transmitted by the User's browser with any other data held by Google. You may refuse the use of cookies by selecting the appropriate

settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may also prevent Google from collecting and processing information about your use of the website (including your IP address) by means of cookies by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=hu>

FACEBOOK PIXEL

The Facebook account is a code that allows the website to report conversions, create audiences and provide the site owner with detailed analytics on how visitors use the site. Facebook remarketing pixel tracking code allows you to display personalised offers and ads to your website visitors on Facebook. The Facebook remarketing list is not personally identifiable. For more information about the Facebook Pixel / Facebook Account, please visit: <https://www.facebook.com/business/help/651294705016616>

SOCIAL MEDIA SITES

1. Fact of data collection, scope of data processed: name registered on social networking sites Facebook/Google+/Youtube/Instagram etc. and public profile picture of the user.
2. Data subjects: all data subjects who have registered on Facebook/Google+/Youtube/Instagram etc. and have "liked" the website.
3. Purpose of the data collection: to share or "like" or promote the website, its content, products, promotions or the website itself on social networking sites.
4. The duration of the processing, the time limit for the deletion of the data, the identity of the possible controllers of the data and the rights of the data subjects in relation to the processing of the data. The data are processed on the social networking sites, so the duration of the processing, the way in which the data are processed and the possibilities for deleting and modifying the data are governed by the rules of the social networking site concerned.
5. Legal basis for processing: the data subject's voluntary consent to the processing of his or her personal data on social networking sites.

CUSTOMER RELATIONS AND OTHER DATA MANAGEMENT

1. If the data controller has any questions or problems when using our services, the data subject can contact the data controller by the methods indicated on the website (telephone, e-mail, social networking sites, chat, etc.).
2. The data controller will delete the data provided in e-mails, messages, Facebook, etc. received, together with the name and e-mail address of the interested party and any other personal data voluntarily provided, after a maximum of 2 years from the date of the communication.
3. Any processing of data not listed in this notice will be notified at the time of collection.
4. In exceptional cases, the Service Provider is obliged to provide information, data or documents in response to a request from a public authority or other bodies authorised by law.

5. In these cases, the Service Provider shall only disclose personal data to the requesting party - provided that the latter has indicated the precise purpose and scope of the data - to the extent and to the extent that is indispensable for the purpose of the request.

THE RIGHTS OF DATA SUBJECTS

1. Right of access

You have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is taking place, the right to access your personal data and the information listed in the Regulation.

2. Right to rectification

You have the right to obtain, at your request and without undue delay, the rectification by the controller of inaccurate personal data relating to you. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

3. Right to erasure

You have the right to obtain from the controller the erasure of personal data relating to you without undue delay at your request and the controller is obliged to erase personal data relating to you without undue delay under certain conditions.

4. Right to be forgotten

If the controller has disclosed the personal data and is under an obligation to erase it, the controller will take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that you have requested the erasure of the links to or copies of the personal data in question.

5. Right to restriction of processing

You have the right to obtain, at your request, the restriction of processing by the controller if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction shall apply for a period of time which allows the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;
- you have objected to the processing; in this case, the restriction applies for a period of time until it is established whether the controller's legitimate grounds override your legitimate grounds.

6. Right to data portability

You have the right to receive personal data relating to you which you have provided to a controller in a structured, commonly used, machine-readable format and the right to transmit these data to another controller without hindrance from the controller to whom you have provided the personal data (...)

7. The right to object

For processing based on legitimate interest or public authority as legal grounds, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data by (...), including profiling based on those provisions.

8. Objection in case of direct marketing

Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data may no longer be processed for those purposes.

9. Automated decision-making in individual cases, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

The previous paragraph shall not apply where the decision:

- necessary for the conclusion or performance of a contract between you and the controller;
- is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect your rights and freedoms and legitimate interests;
- or is based on your explicit consent.

DEADLINE FOR ACTION

The controller shall inform you of the action taken on the above requests without undue delay and in any event within 1 month of receipt of the request. If necessary, this period may be extended by 2 months. The controller shall inform you of the extension, stating the reasons for the delay, within 1 month of receipt of the request. If the controller does not take action on your request, it shall inform you without delay and at the latest within one month of receipt of the request of the reasons for its failure to act and of your right to lodge a complaint with a supervisory authority and to seek judicial remedy.

THE SECURITY OF DATA PROCESSING

The controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the scale of the risk, taking into account the state of the art and the cost of implementation, the nature, scope, context and purposes of the processing, and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons, including, where appropriate:

- pseudonymisation and encryption of personal data;
- by encrypting passwords provided by the user
- communication over an encrypted SSL channel

- restricting access to information
- ensuring the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
- in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;
- a procedure for regularly testing, assessing and evaluating the effectiveness of the technical and organisational measures taken to ensure the security of data processing.
- be made available by means of publicly disclosed information or similar measures ensuring that data subjects are informed in an equally effective manner.

INFORMING THE DATA SUBJECT OF THE PERSONAL DATA BREACH

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject of the personal data breach without undue delay.

The information given to the data subject shall clearly and prominently describe the nature of the personal data breach and provide the name and contact details of the data protection officer or other contact person who can provide further information; describe the likely consequences of the personal data breach; describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

The data subject need not be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational protection measures and those measures have been applied in relation to the data affected by the personal data breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;
- the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise;
- the provision of information would require a disproportionate effort. In such cases, the data subjects shall be informed by means of publicly disclosed information or by means of a similar measure which ensures that the data subjects are informed in an equally effective manner.

Where the controller has not yet notified the data subject of the personal data breach, the supervisory authority may, after having considered whether the personal data breach is likely to present a high risk, order the data subject to be informed.

REPORTING A PERSONAL DATA BREACH TO THE AUTHORITY:

The controller shall notify a personal data breach to the supervisory authority competent pursuant to Article 55 without undue delay and, where possible, no later than 72 hours after the personal data breach has come to its attention, unless the personal data breach is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by the reasons justifying the delay.

POSSIBILITY TO COMPLAIN:

Complaints against possible infringements by the controller may be lodged with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information Address.

Postal address: 1530 Budapest, P.O. Box 5.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

CLOSING:

The following legislation has been taken into account in the preparation of this information:

- REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation)
- Act CXII of 2011 - on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Infotv.")
- Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services (in particular Article 13/A)
- Act XLVII of 2008 - on the Prohibition of Unfair Commercial Practices against Consumers;
- Act XLVIII of 2008 - on the basic conditions and certain restrictions on commercial advertising (in particular § 6)
- Act XC of 2005 on Freedom of Electronic Information
- Act C of 2003 on Electronic Communications (specifically § 155)
- Opinion No 16/2011 on the EASA/IAB Recommendation on best practice for behavioural online advertising
- Recommendation of the National Authority for Data Protection and Freedom of Information on data protection requirements for prior information
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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 Regulation (EC) No 95/46/EC

Dunai Sétahajózási Kft.

Budapest, 02.02.2022.