

Data Management Policy

The aim of the present policy information is to state the data protection and management principles applied by metzdaniel.hu (website) and the operator of the website, Metz Dániel entrepreneur, and the data protection and management policy of the Service Provider, which the Service Provider accepts to be bound by, as the aim of the Service Provider is to ensure the protection of the personal data of the persons registered on their website so far as possible.

By using the website and any of its services, applications, the User gives their consent to their personal data to be managed in accordance with the regulations of the present Data Management Policy.

I. THE DATA OF THE ENTREPRENEUR AS DATA MANAGER

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Data management registration number: NAIH-128833/2017

II. DEFINITIONS

The expressions used in the present policy are to be understood as defined below, in accordance with the definitions included among the interpretation criteria of act CXII of year 2011 concerning the rights to informational self-determination and freedom of information (hereafter Info act).

Personal data: data that can be connected to the person concerned – especially the name, identification of the person concerned, and one or more piece of information distinguishing their physical, physiological, mental, economic, cultural or social identity – and any conclusions that can be drawn from this data;

Person concerned: any specific natural person, who is identified or can be – directly or indirectly – identified on the basis the personal data (in the case of the present policy, this person is the User);

Consent: the voluntary and firm expression of the will of the person concerned, based on appropriate information, by which they give unmistakable consent to the management – full or involving certain operations – of the personal data referring to them;

Data management: any operation or the set of operations regardless of the applied procedure, thus specifically the collection, registration, recording, organisation, storage, modification, use, query, forwarding, disclosure, harmonization and connection, blocking, deletion and destruction of data, and the prevention of the further use of data, preparation of photographic, audio or image recordings, and the registration of physical characteristics suitable for the identification of the person (e.g. finger- or palm print, DNA sample);

Data manager: the natural person or legal entity, or organisation without legal entity, which, either individually or together with others, define the purpose of the data management, make and execute the decisions concerning the data management (including the applied tool), or order the data processor employed by them to execute the decisions (in the case of the present Policy, this is the Service Provider);

Data transmission: making the data available to a specified third party;

Disclosure: making the data available to any person;

Deletion of data: making the data unrecognisable in a way that it will be impossible to restore;

Data identification: providing the data with an identification marker in order to distinguish it;

Blocking the data: providing the data with an identification marker in order to block it permanently or for a definite period;

Data processing: performing the technical tasks related to the data management operations, regardless of the method and tool applied when performing the given operations, and of the location of their application, provided that the technical tasks are performed on the data;

Data processor: the natural person or legal entity, or organisation without legal entity, who or which, in accordance with their contract concluded with the data manager, – including a statutory conclusion of contract as well – performs the processing of the data;

III. PRINCIPLE OF DATA MANAGEMENT

The Service Provider manages the registered personal data in accordance with the prevailing data management legislations – thus especially with the Info act – complying with the present policy.

IV. THE LEGAL BASIS OF THE DATA MANAGEMENT

In the course of the data management related to the operation and services of the website, the registration and management of data are based on the voluntary consent of the person concerned.

The User can give their consent by using the services of the website and by filling the forms found on the website.

The Service Provider is entitled to send a newsletter or other letter of advertising purposes to the User, if the User previously subscribed to this unequivocally, explicitly and voluntarily, by providing their appropriate data. The Service Provider is not obliged to verify whether the data provided by the User at the subscription and otherwise, when granting their consent, is real and correct.

The User is at any time entitled to withdraw their voluntary consent mentioned in the previous section. In this case, after the withdrawal the Service Provider shall not send further newsletters and other letters with advertising purposes to the User, moreover, they shall delete the User's data among the data of users subscribed to the newsletter.

Unless it is regulated otherwise by the law, the Service Provider can manage the registered personal data after the withdrawal of the User's consent, without further separate consent thereto, in order to fulfil their legal obligations (thus especially accounting obligations, and contractual obligations with the User), and also in order to realise their own or a third party's legitimate interest, if the realization of these interests is in proportion with the limitation of the right to the protection of personal data.

V. THE SCOPE OF THE MANAGED DATA

In accordance with the User's voluntary consent, in the course and after the fulfilment of the service provided by them, Service Provider manages the following personal data of the User: surname, first name, e-mail address.

The User bears responsibility for correctness and accuracy of the personal data.

VI. THE PURPOSE OF THE DATA MANAGEMENT

The purpose of managing the personal data of the User is sending newsletters and other letters with advertising purposes, mentioned in section IV, and the fulfilment of other legal obligations of the Service Provider. The Service Provider shall not disclose the User's personal data to any unauthorised third party.

VII. DURATION OF THE DATA MANAGEMENT, MODIFICATION, DELETION OF THE DATA, OBJECTION AGAINST THE DATA MANAGEMENT

The Service Provider manages the personal data managed in connection with using the services until the purpose of the data management is realised.

The User can request the Service Provider to delete their personal data by sending an electronic mail to the address metzdaniel.hu. The Service Provider shall delete the User's personal data without the request of the person concerned, if the management thereof is against the law, the purpose of the data management has terminated, or the statutory period of storing the data has expired, or the deletion was ordered by the National Authority for Data Protection and Freedom of Information, or if the data management is incomplete or erroneous - and this condition cannot be lawfully rectified – provided that the deletion is not excluded by law.

Instead of deleting the personal data, the Service Provider shall block it if it is requested by the User, or, if, on the basis of the available data, it can be presumed that the deletion could violate the lawful interests of the User. The Service Provider shall only manage the thus blocked personal data while

the purpose of the data management, which rules out the deletion of the personal data. Following the withdrawal of the User's consent, the Service Provider can continue to manage the personal data referring to the person concerned in order to fulfil their statutory obligations (thus especially the accounting obligations).

The User can object to the management of their personal data by sending an electronic letter to the email address metzdaniel.hu,

– if the management or transfer of personal data is necessary only for the fulfilment of the statutory obligation concerning the Service Provider or the realisation of the legitimate interest of the data manager, recipient of the data or a third party, with the exception of the case of the so called compulsory data management;

– if the use or transfer of the personal data is performed for direct marketing, poll or scientific research; and

– in other cases regulated by any law.

The data manager shall investigate the objection within the shortest time possible, but not more than 15 days from the submission of the request, they make a decision concerning whether the objection is grounded and informs the requesting party of their decision in writing.

If the data manager finds that the objection of the person concerned is grounded, they shall cease the management of the data – including further registration and transfer of the data – and they shall block the data, and also shall notify of the objection and of the measures taken on the basis thereof all those parties to whom they previously transferred the personal data affected by the objection, and who are obliged to take measures in order to realise the right to objection.

If the person concerned does not agree with the decision of the data manager, or the data manager fails to comply with the deadline of 15 days, the person concerned can take the matter to court within 30 days from the communication of the decision or from the final day of the deadline. The court shall deal with the matter urgently.

If the recipient of the data does not receive the data necessary for the realisation of their rights due to the objection of the person concerned, they can take the matter to court against the data manager within 15 days from the notification, in order to obtain the data. The data manager can also bring an action against the person concerned.

If the data manager fails to notify, the recipient of the data can ask for information concerning the circumstances related to the failure of the transmission, and the data manager is obliged to give the information within 8 days from the receipt of the request thereto of the recipient of the data. In case of a request for information the recipient of data can take the matter to court against the data manager within 15 days from receiving the information but not later than from the deadline thereof. The data manager can also bring an action against the person concerned.

The data manager cannot delete the data of the person concerned if the data management was ordered by law. However, the data cannot be transferred to the recipient of the data if the data manager agreed with the objection or the court has stated the rightfulness of the objection.

VIII. REQUESTING INFORMATION

The User is entitled to ask for information at any time concerning the personal data referring to them, managed by the Service Provider in connection with the services of the website, on the email address metzdaniel.hu or on the +36 20 3913408 telephone number. At the request of the User the Service Provider provides information concerning the data related to the User, managed in relation to the provided service by the Service Provider, the source of the data, the purpose, legal basis, duration of the data management, the name, address of the data processor, the legal basis of the transmission of the data, its addressee and the activity connected to the data management. At the request of the User, the Service Provider is obliged to provide the information in writing, in an understandable form, within the shortest possible time, but not more than within 30 days from the submission of the request. The information is free of charge. The Service Provider shall consider the request received from the email address previously given to the Service Provider to be a request sent by the User. In the case of requests submitted from a different email address and in writing, the User can only submit a request if they have appropriately verified their user identity.

IX. NEWSLETTER

The data manager only sends advertisement or mail containing commercials (newsletter) to the electronic mail address provided at the subscription with the explicit consent of the user, in the cases and manners complying with the statutory requirements. The user can unsubscribe from the newsletter by using the link found at the bottom of the newsletter.

POSSIBILITIES FOR ENFORCING RIGHTS

In accordance with the Info act and act IV. of year 1959 (Civil Code), the User can exercise their possibilities for enforcing their rights at court, furthermore, they can request the assistance of the National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/C, mailing address: 1530 Budapest, Pf. 5., ugyfelszolgalat@naih.hu, (+36) 1 391 1400, www.naih.hu) in any issue related to personal data.

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