

## PRIVACY POLICY

regarding the data processing in connection to the website at *petofi.hu*

The operator of the above website, **Petőfi Cultural Agency Nonprofit Private Company Limited by Shares** (registered office: H-1033 Budapest, Hajógyár utca 18386/5., registered by the Metropolitan Court of Budapest as registrar, under company registration number 01-10-141338, tax ID number: 29229158-2-41, hereafter referred to as: **Service Provider/Company**) hereby informs Users regarding the data processing conducted in relation to the website found at <https://petofi.hu> (hereafter referred to as: Website) and to the activities conducted by the Service Provider pursuant to the regulations of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereafter as: **GDPR**), and with Act CXII of 2011 on the right to information self-determination and the freedom of information (hereinafter as: Infotv.)

The present Privacy Policy pertains to the processing of personal data provided by the User to the Service Provider, moreover to any personal data that may be received by the Service Provider via their online platforms or by way of “cookies”.

### I. Terms and definitions

For the purposes of the present Notice, the terms below shall mean the following:

- **Personal data:** any information relating to an identified or identifiable natural person (hereinafter referred to as: data subject); an identifiable person meaning one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person;
- **Data processing:** any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Data controller:** the natural or legal person, government body, agency or any other organisation, which determines the purposes and means of the data processing either solely or jointly with others; if the purposes and means of the data processing is regulated by EU or state laws, such EU or state laws may set out the data processor to be appointed, or may set out the specific aspects per which the data processor is to be appointed;



- **Data processor:** the natural or legal person, government body, agency or any other organisation, which processes personal data on behalf of the data controller;
- **Data erasure:** the complete physical destruction of the media containing the data;
- **Data forwarding:** the making available of the data to a given third party;
- **Data deletion:** rendering the data incomprehensible in a way that allows for no reinstatement thereof;
- **User:** the person visiting, browsing the Website and using the services thereon (Data subject);
- **Website:** the online portal operated by the Service Provider (<https://petofi.hu>).

## **II. General provisions**

The Website and the websites connected thereto may be accessed by anyone – without having to hand over their personal data – and may freely gain information thereon without restriction. Users may receive information regarding the activities of the Service Provider on the Website. Users are solely liable for the data handed over to them and the contents the upload, for which Service Provider expressly denies any liability.

Service Provider is entitled to amend the present privacy policy unilaterally, at any time. Service Provider issues the amendments of the present privacy policy by publishing them on the Website. Users are kindly requested to carefully consult the privacy policy upon any visit to the Website.

The present privacy policy is continuously available on the Website. Users may open, view, print or save the present privacy policy, but may not amend or alter it, this is the sole prerogative of the Service Provider.

## **III. Categories of personal data processed by Service Provider, the purpose, legal basis, mode and timeframe of processing**

### **The legal bases for data processing are the following:**

- a) GDPR Article 6 (1) a), where the processing is based on the informed consent of the data subject (hereafter referred to as: Consent);
- b) GDPR Article 6 (1) b), where processing is necessary for the performance of a contract to which the data subject is party (hereafter referred to as: Conclusion of Contract)
- c) GDPR Article 6 (1) c) where data processing is necessary for the fulfilment of or compliance with a legal obligation of the data controller (e.g. obligations with tax statutes – hereafter referred to as: Compliance)
- d) GDPR Article 6 (1) d), where processing is necessary in order to protect the vital interests of the data subject or of another natural person (hereafter referred to as: Vital Interest);



- e) GDPR Article 6 (1) e), where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (hereafter referred to as: Public Interest);
- f) GDPR Article 6 (1) f) where data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, (hereinafter referred to as: Lawful Interest)



## 1. Data processing in connection to the Website

Data subject	Data category	Data source	Purpose of data processing	Legal basis of data processing	Timeframe of processing, time of deletion
<b>User visiting the Website</b>	Country, type and version number of browser, device and operating system used, language settings	Data subject (User)	Statistical analysis, development of Website	GDPR Article 6 (1) f), necessary for the purposes of the legitimate interests pursued by the controller	4 months from time of visit
	Statistical data regarding Website visits	Data subject (User)	Statistical analysis, development of Website	GDPR Article 6 (1) f), necessary for the purposes of the legitimate interests pursued by the controller	4 months from time of visit

Service Provider uses cookies and other various programs in order to ascertain the Website's Users' preferences regarding the Website, and to develop the Website based thereon.

The above data processing is the lawful business interest of the Service Provider since this serves to enable the Service Provider to improve the Website and to make it more secure. The scope of the collected data is not significant, these are only collected and processed by the Service Provider, with Service Provider collecting no behavioural preferences, and conducting no automated decision making based thereon, with no personalised offer being sent by the Service Provider to Users based thereon. Concordantly, this data processing does not affect User's fundamental rights and freedoms adversely.

### Google Analytics

The Google Analytics is a web analytics service provided by Google LLC ("Google") to help learn more about how visitors use the Website. Google Analytics summarises information about the use of the Website, such as IP address, which may be sent to Google and stored on their servers. This information, received in an anonymous form, is used by the Service Provider to compile reports and to improve the operation of the Website. The cookies collect anonymous information as well as information about the number of visitors to the Website, the pages from which visitors come to the Website and the pages they view. More information about Google Analytics cookies can be found at the following link: <http://www.google.com/policies/privacy/>. In case Users prefer to turn off Google Analytics tracking when visiting the Website, they can do so via the following link: <http://tools.google.com/dlpage/gaoptout>



## 2. Data processing regarding direct marketing and newsletters

The data controller provides the Users with the possibility to contact the data controller directly through the contact form provided on the Website.

The data controller processes the following personal data relating to the User: .

Data subject	Data category	Data source	Purpose of data processing	Legal basis of data processing	Timeframe of processing, time of deletion
User filling and submitting the form	Name	Data subject (User)	Contact User identification	GDPR Article 6 (1) a): consent GDPR Article 6 (1) f): consent lawful interest	Until the consent is revoked, but for a maximum of 1 year, except in the case of messages containing a complaint.
	E-mail address	Data subject (User)	Contact User identification	GDPR Article 6 (1) a): consent GDPR Article 6 (1) f): consent lawful interest	In the case of a complaint, the data shall be stored for 5 years from the date of the complaint, in accordance with the general limitation period under civil law, provided that if civil, criminal, administrative or other official proceedings are initiated during this period, the data shall be stored until the final termination of the proceedings.

Users have the right to revoke their consent to the processing of their personal data provided as described above at any time by sending a written notice to the Data Controller at any of the contact details of the Data Controller provided in this Privacy Policy. The revocation of consent shall not affect the lawfulness of the processing that took place prior to the revocation.

## IV. Data controller and data processors

Regarding the data specified under point III, the data controller is the Service Provider:

### **Petőfi Cultural Agency Nonprofit Private Company Limited by Shares**

Registered seat: 1033 Budapest, Hajógyár utca 18386/5.

Registrar: Metropolitan Court of Budapest



Company reg. no.: 01-10-141338  
Tax ID no.: 29229158-4-41  
E-mail address: [info@petofiugynokseg.hu](mailto:info@petofiugynokseg.hu)

On behalf of the Service Provider, the data of the User may be accessed by the employees of Service Provider to the extent that is necessary for the carrying out of their tasks. Access rights to personal data are regulated in a strict internal policy.

### **Data processors**

Service Provider engages various enterprises for the processing and storing of User's data, with whom Service Provider concludes data processing agreements. The following data processors conduct data processing regarding the User's data:

<b>Name and address (registered office) of data processor</b>	<b>Purpose of data processing</b>	<b>Categories of processed data</b>
<b>Nemzeti Infokommunikációs Szolgáltató Zrt.</b> (1149 Budapest, Róna utca 52-80., company reg. no.: 01-10-041633; tax number: 10585560-2-44)	Hosting services	Data specified under point III.
<b>Google Ireland Limited</b> (Gordon House, Barrow Street, Dublin 4., Ireland)	Google Analytics service	Data specified under point III.
<b>MonsterInsights LLC</b> (West Palm Beach, FL, USA)	Google Analytics processing service	Data specified under point III.

### **Recipients of data forwarding**

In the course of processing the data, the Data Controller is entitled or obliged to transfer or make available certain personal data of the data subject to other data controllers, third parties or to data processors to the extent that:

- it is necessary for the performance of a contract or to take steps prior to the conclusion of a contract;
- it is required by law for the performance of a legal obligation or a public task;
- necessary for a legitimate interest;
- it is possible on the basis of consent given by the data subject.

Possible recipients:



- authorities supervising the operation of the Data Controller and the lawful use of budget support [Ministry of Culture and Innovation, Magyar Kultúraért Alapítvány (Foundation for Hungarian Culture), State Audit Office, Hungarian State Treasury, and other authorized legal institutions]
- organisations entitled to request official data [e.g. police, prosecutor's office, National Tax and Customs Administration (NTCA), etc.]

The Data Controller is entitled and obligated to hand over personal data in their possession and lawful storage to the competent authorities where they are compelled to by applicable law or a final authority decision. The Data Controller shall not be held liable for such transfers and the consequences thereof

#### **Forwarding data to a third country**

The Data Controller shall not transfer data processed in accordance with the present Privacy Notice to a third country as defined by the GDPR.

#### **Automated decision-making, profiling**

Service Provider does not conduct automated decision-making or profiling regarding the data processed per the present Privacy Policy.

#### **V. Data privacy directives observed by Company**

The Company respects the legally protected rights of their Users.

The personal data that is directly necessary for the usage of the services of the Company is processed by the Company per the consent of the data subjects, and strictly for the purposes pertaining thereto. The Company uses the personal data of the Users specified under point III hereto only per the means and purposes set out in the present Privacy Policy.

The Company as data controller undertakes to process the data in their possession per the provisions of the GDPR, of the Infotv. and other relevant legal regulations, and the regulations of the present Privacy Policy, and to refrain from making them available to any third parties not including those specified in the present Privacy Policy. The use of statistical compilations of data that do not contain the names or identifying data of Users in any way serve as an exception to the present point, as these do not constitute data processing, nor data forwarding.

The Company shall, in certain situations – e.g. official court or police inquiries, legal procedures regarding copyright, property or other disputes or the suspicion thereof concerning infringements upon the lawful interest of the Company, the endangerment of their provision of services, as well as per court or authority warrants –, as well as based on the User's prior express consent, make User's data available to third parties.





The Company shall make every reasonable effort to ensure that the processing and management of the Users' data is given the protection set out by applicable law.

## **VI. Protection of personal data**

The Company complies with their obligations deriving from the applicable privacy regulations by:

- safely storing and deleting them;
- not collecting or storing excess amounts of data;
- protecting personal data from loss, violation, unauthorised access or publication, as well as ensuring that adequate technical measures are in place, protecting personal data.

The Company carries out adequate technical and organisational measures in order to protect the Users' personal data from accidental or unlawful destruction, loss or modification, as well as unlawful communication or access – especially where network communication thereof is a part of the processing –, and to protect data from any unlawful form of processing.

Accordingly, the Company emplaces various levels of access rights over the data, which ensures that the data are only accessed by persons having adequate clearance, who are required to access the data in order to carry out their job or to fulfil their related obligations.

## **VII. Rights of the User**

- 1) Pursuant to the data protection legislation in place, the data subject is entitled to:
  - a) request access to their personal data,
  - b) request corrections regarding their personal data,
  - c) request deletion of their personal data,
  - d) request the restriction of their personal data,
  - e) object to the processing of their personal data,
  - f) subject to specified exceptions, request that the Data Controller exempt decisions taken solely by automated processes from the scope of the exemption,
  - g) request the porting of their personal data,
  - h) object to the processing of their personal data (including objections to profiling; or other automated decision-making rights),
  - i) revoke their consent regarding data processing, or file a complaint to the competent supervisory authority,
  - j) take legal remedies in court .



**a) Right of access**

The data subject is entitled to receive feedback from the data controller on whether their personal data is being processed or not, and if so, to request access to their personal data.

The data subject is entitled to request copies of their personal data being processed. For the purposes of identification, the data controller may request additional information from the subject, and – with the exception of the first copy being handed out – to charge any warranted administrative fees that further copies may entail.

**b) Right of correction**

The data subject is entitled to request any of their erroneous personal data to be rectified by the data controller. Based on the given data processing purpose, the data subject may be entitled to request incomplete personal data to be amended.

**c) Right of deletion („right to be forgotten”)**

The data subject is entitled to request the data controller to delete their personal data, and the data controller shall delete these. In any such case, the data controller will not be able to provide any further services to the User. The Data Controller shall delete personal data concerning the User without undue delay if one of the following reasons applies:

- a. the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Data Controller;-
- b. the User revokes the consent on the basis of which the processing was carried out and there is no other legal basis for the processing;
- c. the user objects to the processing and there is no overriding legitimate ground for the processing;
- d. the personal data have been unlawfully processed by the Data Controller;
- e. the personal data must be erased in order to comply with a legal obligation applicable to the Data Controller;
- f. the personal data have been collected in connection with the provision of information society services.

**d) Right of restriction**

The data subject is entitled to request the restriction of their personal data. In this case, the data controller shall mark the affected personal data, which shall only be processed for certain specific purposes. The Data Controller shall restrict processing if the following conditions are fulfilled::

- a. the User disputes the accuracy of the personal data, in this case the restriction shall apply for a period of time which allows the Data Controller to verify the accuracy of the personal data;
- b. the processing is unlawful and the user objects to the deletion of the data and requests instead the restriction of their use;
- c. the Data Controller no longer needs the personal data for the purposes of the processing, but the User requires them for the purposes of legal claims,
- d. to enforce or defend; or



- e. the User has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the User.

In the event of the exercise of the right of restriction, the Data Controller may continue to use the User's personal data, provided that.

- a. the Data Controller has obtained the consent of the user; or,
- b. if the use (existence) of the data concerned is necessary to enforce a right or legitimate interest before a court; or
- c. where the use (existence) of the data concerned is necessary to protect the rights of another natural or legal person.

**e) Right to objection**

The User is entitled to object at any time, for any reasons of their own, to the processing of their personal data, including the profiling based on said regulations, and to request that the data controller no longer process their personal data.

Moreover, where the User's data is processed by the Service Provider per lawful interest, User is entitled to object to their data being processed per this basis.

In this case, the Data Controller shall no longer process the personal data, except if the Data Controller proves that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the User or are related to the establishment, exercise or defence of legal claims.

**f) Implementation of automated processes**

The User may request that the Data Controller exempt from the scope of decisions taken solely by automated processes if

- a. the decision taken in such a process would have legal effects on the User; or
- b. would affect the user to a similarly significant extent.

The right under this point shall not apply if the decision is the result of automated decision-making:

- a. necessary for the conclusion or performance of a contract with the User; or,
- b. if it is permitted under European Union or Member State law which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the User; or
- c. if it is based on the explicit consent of the User.

Please note that the Data Controller does not use automated decision-making mechanisms.

**g) Right to data portability**



The data subject is entitled to request that their given personal data be provided to them in an articulated, widely recognised, computer readable format (i.e. digital format) from the data processor, and is entitled moreover – where technically possible – to request these data to be forwarded to another data controller without the Service Provider hindering this. The Data Controller shall be obliged to transfer the data if:

- a. the processing is based on consent or a contract; and
- b. the processing is carried out by automated means

**h) Right to objection**

The data subject is entitled to object at any time, for any reasons of their own, to the processing of their personal data per Article 6 (1) e) or f) of the general data protection regulation, including the profiling based on said regulations. In this case, the Data Controller may no longer process the personal data, except where the Data Controller proves that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

**i) Right to revoke consent**

Where the processing of User's personal data is conducted per their consent, User may revoke their consent at any time by changing their website-profile or mobile device settings or by email at any time without giving any reason. Revocation of consent does not affect the legality of consent-based data processing conducted prior to the revocation of consent.

If User revokes their consent given to the Service Provider, the services provided by the Service Provider may partially or wholly be unavailable to be provided.



**j) Right to file a complaint with the supervisory authority**

If the User believes that their personal data have been infringed upon, they may file a complaint – free of charge and in the form of their choice – with the local data privacy supervisory authority, primarily per their residence, their place of work or in the member state where the purported breach had taken place.

In Hungary, they may also turn to the National Authority for Data Protection and Freedom of Information: H-1055, Hungary, Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.:9.; telephone: +36-1 391-1400; telefax: +36-1 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: <http://www.naih.hu>)).

**2) Deadline**

The Data Controller shall comply with the User's request for the exercise of rights no later than 30 (thirty) days from the date of receipt. The date of receipt of the request shall not be counted in the time limit.

**3) Identification**

The Data Controller strictly respects the confidentiality of records containing personal data and therefore requests that Users send requests for such records from the e-mail address used during registration. In case the User uses a different e-mail address, the Data Controller reserves the right to verify their identification through an additional set of questions.

**4) Fees**

The Data Controller shall not charge any fee for the exercise of the User's rights to personal data, except where the request for disclosure or access is unfounded, unnecessarily repetitive, disproportionate or excessive, in which case the Data Controller shall provide the data or access to the data for a reasonable fee.

The Data Controller shall notify the User of any request for payment of a fee in advance, before processing the request..

**VIII. Contact keeping**

Should the User wish to exercise their data privacy rights or to lodge a complaint, they may contact the Service Provider's appointed colleague via an e-mail sent to the e-mail address below. Moreover, User may seek out the Service Provider by way of mail sent to the postal address below.



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

Postal address: H-1033 Budapest, Hajógyár utca 18386/5.

#### **IX. Miscellaneous provisions**

In case of any data privacy incidents, the Service Provider shall notify the supervising authority per the applicable legal regulations, **within 72 hours** from having gained knowledge of the incident; and shall keep records thereof. The Service Provider shall notify Users thereof in cases specified by law.

The data processor shall regularly check their online platforms and the information published thereon and shall make every reasonable effort to ensure the information thereon are current and factual. However, User may find information on these online platforms that are out of date. The Service Provider accepts no material liability for this information.

The present Privacy Policy shall enter into force on the 22<sup>nd</sup> of January 2025.