

# **Privacy Policy**

## **I. Data Controller**

**Name: Koteczki, István**

**Address: 10. Bercsényi str. Szeged, 6721, Hungary**

**Phone number: +36-30-4008898**

**E-mail address: koteczki@hotmail.com**

## **II. Data Protection Officer**

**We do not engage in any activities that would require a Data Protection Officer.**

## **III. Principles and lawful bases for data processing**

**The purpose of this policy is to enable visitors of this site and our future partners and clients to understand - in a transparent and clear form - what personal data we are handling and for what purpose we use them.**

### **1. Email**

**Our email is intended to provide online communication. Your email address is required to send us a message. You will probably introduce yourself providing your name. We treat this data as a contribution, by providing these information you are consenting to the processing of these data.**

### **2. Facebook page**

**We use Facebook page to advertise our website, where you are able to like, share or comment. When you do this, we will be able to see your name and your comment.**

### **3. Communication with business partners and clients**

**In the course of our business, we handle personal data and contacts of our partners on a legitimate basis: name, phone number, email address.**

### **4. Cookies**

**The cookie is a font and number information package usually sent to your browser for the purpose of saving certain settings, facilitating the use of the site, and contributing to collecting some relevant, statistical information about visitors. Cookies do not contain personal data and are not suitable for individual user authentication. Cookies often contain a unique identifier - randomly generated numbers - that your device stores. Some cookies will disappear after the website is closed and some will be stored for longer on your computer.**

**You can prevent all activities related to cookies and delete all files that you have saved during your previous visits. To learn more please visit the following pages:**

## **Clear, enable, and manage cookies in Chrome**

## **Enable and disable cookies in Firefox**

## **Manage cookies in Internet Explorer and Edge**

Some browsers also allow you to delete browsing data automatically each time you close it.

When downloading parts of this website, the analysis software we use (Google Analytics operated by Google Inc.)

automatically places small data files containing your personal data on your computer. You are notified about this when you first visit this website and we ask your consent. These data files are required for the operation of some of website, and information from previous data files that you receive during your visits is sent to the Data Controller. You will find detailed information about these files (`_ga`, `_gat`, `_gid`) and its function [on this page](#). Google Analytics retrieves anonymous IP (anonymously) from the browser and can not connect it to the user. The data is stored for 26 months, the start of the time period restarts when a new event occurs (eg, user starts a new session).

If you want to prevent Google Analytics from adding your visit on any website to its analytics, [use this extension](#) (available on any browser).

If you have previously received a cookie from Facebook - either because you have an account or because you have visited facebook.com - your browser will send data about this cookie whenever you click the "Like" button or visit a website with a social plugin. For more information, [see here](#).

Cookies used on this site:

### **Necessary**

| <b>Cookie Name</b> | <b>Provider</b>       | <b>Purpose</b>   | <b>Type</b> | <b>Expiry</b>  |
|--------------------|-----------------------|--|-------------|----------------|
| <b>PHPSESSID</b>   | <b>visitszeged.eu</b> | <b>Stores the user's cookie consent state for the current domain</b> | <b>HTTP</b> | <b>Session</b> |

## **IV. Consent withdrawal**

Data processing (see above) for the following activities is based on your consent:

- contact through email
- operating a Facebook page
- visitors statistics

Consenting can be withdrawn at any time as simply as it was provided.

On Facebook, you can withdraw your consent by unliking the page or deleting your private message or comment.

For other consent-based data processing, please write a short message to [koteczki@hotmail.com](mailto:koteczki@hotmail.com)

Data processing prior to the withdrawal of consent is considered legitimate.

#### **V. Contract and legal obligations**

After engaging our services, a contract with the client is concluded in writing or verbally. Personal data may be included in the contracts, such as contact name, phone number, e-mail address or the name of the legal representative. The condition of the contract is to have these information provided. Without providing the required information, we consider the contract invalid and can not fulfill the service.

#### **VI. Legitimate interest**

We handle contact information and names of our business partners, business associates or contacts based on legitimate interest.

This personal data has been provided to us by those who have been involved in our past correspondence and encounters for many years, and have already been convinced of our confidentiality.

We provide the right to request the restriction or suppression of their personal data to all our partners.

#### **VII. Duration of data storage**

Facebook page (name, comment) - until page deletion, until the page is unliked or comment is deleted

Email communication (email address, name) - business relationship duration or until erasure is requested

Clients/partners information (name, email address, phone number) - business relationship duration or until erasure is requested

Cookies coming from the [visitszeged.eu](http://visitszeged.eu) website - until the validity of the cookies or until the user deletes them from their browser

## **GA statistics - 26 months**

### **VIII. Security measures**

**We take appropriate security measures to protect personal data against unauthorized access, misrepresentation or unauthorized modification. These measures include an electronic firewall and various other protection measures that involve virus scanning, installation of security patches, vulnerability testing, backup and recovery planning, security audits and other steps designed constantly to improve the data protection posture.**

### **IX. Recipients**

**We engage data processors to fulfill certain tasks.**

**Hosting Service:**

**Webhely.Net**

**Perx Plus Kft., 6724 Szeged, Árvíz u. 22.**

**(Access to the full content of the website and forwarding emails.)**

**Receiving and sending emails:**

**Hotmail - Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-7329, USA**

**(Access to emails and all their data.)**

**Facebook page:**

**Facebook Inc.**

**Menlo Park, California, USA**

**Privacy Policy:**

**<https://www.facebook.com/about/privacy/update>**

**(Access to user name and comment.)**

**Google Analytics:**

**Google Inc., Mountain View, California, USA**

**(Access to the website visitors' anonymous, unrelated IP address.)**

### **X. Transmission to a third country**

**The United States of America is the only third country to which data is transmitted. A US Declaration of Conformity was issued on 12. July 2016. ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en)) which is also kept Google (<https://policies.google.com/privacy/frameworks>), and Facebook (<https://www.facebook.com/about/privacyshield>).**

## **XI. Individual rights**

### **1. Right to access**

**Our users/clients/partners are entitled to request feedback on whether their personal data is being processed and, if so, entitled to have access to the following information:**

- purpose of data processing**
- the categories of personal data**
- recipients with whom personal data is shared, including third country recipients and international organizations**
- the intended duration of storage of the data. Where this is not possible, the criteria for determining that period**
- the right to request the data controller to correct, delete or restrict the personal data**

**We provide a copy of the personal data subject to data processing. For additional copies, we charge a reasonable fee for the administrative costs. If the request is submitted electronically, we provide the information in a widely used electronic format (.doc, .pdf, .xls, .jpg, etc.) unless requested otherwise.**

**The right to request a copy should not adversely affect the rights and freedoms of others.**

### **2. Right to rectification**

**Our users/clients/partners have the right to have inaccurate personal data rectified, or completed if it is incomplete. We must contact each recipient and inform them of the rectification or completion of the personal data - unless this proves impossible or involves disproportionate effort. We will inform the person concerned about these recipients upon request.**

### **3. Right to erasure**

**Our users/clients/partners have the right to have their personal data erased if:**

- personal data is no longer necessary for the purpose of originally collected or processed for**
- we are relying on consent as our lawful basis for holding the data, and you withdraw your consent**
- we are relying on legitimate interests as our basis for processing, and you object to the processing of your data, and there is no overriding legitimate interest to continue this processing**

- we have processed the personal data unlawfully
- we have to do it to comply with a legal obligation

When we have disclosed the personal data to others, we must contact each recipient and inform them of the erasure, unless this proves impossible or involves disproportionate effort. We will inform the person concerned about these recipients upon request.

Where personal data has been made public in an online environment reasonable steps should be taken to inform other controllers who are processing the personal data to erase links to, copies or replication of that data. When deciding what steps are reasonable we take into account available technology and the cost of implementation.

We do not need to delete personal data if data processing is necessary for the submission, validation or protection of legal claims. If we receive a request for deletion of such information, we will consider it and will inform about our decision in writing.

#### **4. Right to restrict processing**

Our users/clients/partners have the right to request the restrict of processing of their personal data in the following circumstances:

- dispute of the accuracy of personal data until clarification
- the data has been unlawfully processed and our user/client/partner opposes erasure and requests restriction instead
- we no longer need personal data for data processing but visitor of this website, client or partner requires to keep it in order to establish, exercise or defend a legal claim
- user/client/partner has objected to processing their data and we are considering whether our legitimate grounds override those of the user/client/partner

We must not process the restricted data in any way except to store it unless:

- we have the consent of user/client/partner
- it is for the establishment, exercise or defence of legal claims
- it is for the protection of the rights of another person (natural or legal)
- it is for reasons of important public interest.

**We will inform our user/client/partner before we lift the restriction.**

**We must contact each recipient and inform them of the restriction - unless this proves impossible or involves disproportionate effort. We will inform the person concerned about these recipients upon request.**

#### **5. Right to data portability**

**The right to data portability gives our users/clients/partners the right to receive personal data they have provided to us in a structured, commonly used and machine readable format. It also gives our users/clients/partners the right to request that we transmit this data directly to another controller.**

**The right to data portability should not adversely affect the rights and freedoms of others.**

#### **6. The right to object**

**Our users/clients/partners may object to processing their personal data**

**if the processing is for their legitimate interest, the processing based upon public task or legitimate interest. Our users/clients/partners must give specific reasons why they are objecting to the processing of their data. These reasons should be based upon their particular situation.**

**In these circumstances we cannot continue processing until we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the user/client/partner or the processing is for the establishment, exercise or defence of legal claims.**

#### **7. Rights related to automated decision making including profiling**

**Since we do not do automated decision making and profiling, we do not provide a legal basis on it.**

#### **XII. Limitation of liability**

**Some pages of the tour guides on our website contain links to other websites and contact details. The privacy policy and data management of these other websites may be different from ours. For example, if you click on a link on the page of one of the tour guides, it will redirect you to another website. It is recommended that you review the privacy policy of these sites beforehand, as we are not responsible and do not have any control over the personal data management and collection by these pages.**

### **XIII. In case of a complaint**

**We handle your personal data with the utmost care. Should you still feel that we have not done all the measures it can be expected to protect your personal data or simply have questions, please email us to [koteczki@hotmail.com](mailto:koteczki@hotmail.com)**

**If our business breaches the data processing principles, the parties concerned may exercise their rights in court in a civil lawsuit.**

**XIV. When defining the lawful basis for the data handling, we considered these legal provisions**

**European Parliament and Council (EU) 2016/679. Article 6(1) (a) provides a lawful basis where data processing is related to the contacting through the website, commenting, operating a Facebook page, website visitor statistics and conversion measurements, cookies and business contacts data.**

#### **Other provisions**

**This Privacy Policy will take effect on 25. May 2018. Should any new guidelines or regulations will become known, making it necessary to modify current policy, we will review its content. In case of changing the nature of our business or should we introduce any new marketing tools, we will also modify this policy accordingly.**