

# Data management information

**Trendency Online Zrt.** (head quarters: 1092, Budapest, Knézich u. 2., from now on: "**Data manager**") informs users and other interested parties about the data management service (from now on "**Service**") of the website planetbudapest.hu (from now on "**Website**") managed by Data manager.

Data manager observes 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 Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance); Act CXII of 2011 (Information law); Act V/2013 promulgating the Civil Code; Act XLVIII of 2008 on the Basic requirements and Certain Restrictions of Commercial Advertising Activities; Act CVIII of 2001 on Electronic Commerce and on Information Society Services when managing data to the extent that is necessary to reach the goal of data management.

Data manager reserves the right to change parts of present Data Management Information. Present Data Management Information does not extend to the data management of websites that the links placed on the Website lead to, or the data management of those service providers that are not in cooperation with Data manager and collect data regarding user activities on the Website in order to analyse user habits and preferences.

Data manager manages personal data directly collected and received from other data managers in accordance with present Data management information.

When applying present Data management information, in accordance with the framework of GDPR, the term personal data is information that relates to an identified or identifiable living individual ("data subject") and the definition of personal data contained in Directive 95/46/EC (henceforth "the data protection Directive" or "the Directive") reads as follows:

Personal data shall mean any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity" In data

management, data quality is preserved as long as an identifiable natural person (data subject) can be identified on the basis of given information.

The additional terms used in present Data management information are in accordance with the terms defined by GDPR.

## **1. Data manager information**

**Name of data manager:** Trendency Online Zrt.

**Head quarters and postal address of Data manager:** 1092, Budapest, Knézich u. 2.

**Phone number:** 06 70 426 1423

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

**Corporate registration number:** 01 10 047275

**Tax registration number:** 23745269-2-43

## **2. Data storage of personal data by Data manager**

Data manager stores the personal data managed by Data manager on the servers of the following data storage services:

**Name of data storage service:** Trendency Online Zrt.

**E-mail of data storage service:** [info@trendency.hu](mailto:info@trendency.hu)

## **3. Scope, purposes, lawfulness of personal data management and duration of storage of personal data**

### **3.1. Personal data of users**

Data manager manages the user data which:

a) users provide during registration to a service, signing up to a newsletter, sending user content to the editors and Data manager of the Website

b) Data manager manages during the application of cookies

c) the information system of the Website automatically stores when users use the Service.

The personal data that Data manager is permitted to manage and is defined according to a) can be as follows: e-mail address; signing up to a newsletter is not possible without providing an e-mail address; without providing additional data, the customisation of the Service cannot happen.

Purposes of data management: identification of users and user rights in connection with the Service; customer service management of users, using user content, sending newsletters.

Lawfulness of data management: subject has given consent to the processing of his or her personal data for one or more specific purposes ((1) a) of Article 6 of GDPR).

Users have the right to revoke the consent they have given to the processing of their personal data or parts of their personal data any time by sending an e-mail to [info@trendency.hu](mailto:info@trendency.hu) or a letter to 1092, Budapest, Knézich u. 2. The consent does not affect the legality of data management before revoking the consent.

Data manager does not provide services regarding information society directly to children, yet it is imaginable that the services are used by children. The legal consent to data management by persons under 16 years of age is legal only if the consent is given by the parent or legal guardian of a minor. The user agrees that the consent is in accordance with the legal conditions presented above.

When signing up, users are required to provide accurate and truthful data. Data manager takes no responsibility if the data provided by users are untruthful, inaccurate or false. If any third party has claims towards Data manager in connection with the accuracy or integrity of the personal data provided by a user, users take full responsibility instead of Data provider. Users when giving their e-mail address in order to use a service, take responsibility that they are the sole users of that e-mail address using the service. Accordingly, the users who register an e-mail address are responsible when logging in via the registered e-mail address.

Signing up for a newsletter in a text box created for this purpose is possible only after providing an e-mail address. The Service provider can send to signed-up users only the information defined by 3.1 of Terms of service via e-mail. Signed-up users have the right to unsubscribe any time, without notification or legal consequences by clicking on the link at the bottom of the newsletter.

b) Data manager for the sake of personalised services, places pieces of data, known as cookie, on the computer of users to read later when users revisit the website. Data stored in a cookie is created by the server upon your connection. This data is labeled with an ID unique to you and your computer. When the cookie is exchanged between your computer and the network server, the server reads the ID and knows what information to specifically serve to you. The purpose of cookies is to identify users, to differentiate users, to identify the browsing activity of users, to store the data used in such activities, to prevent data loss, to track users and to store the data used while visiting a website in order to specifically serve to a given user.

Scope of managed data: IP address, date and duration of visit, browsing history, technical data of a device used while browsing (operational system), data source when using a website.

Purposes of data management: identification of users and their browsing activity, measuring web analytics, increasing user experience, customising advertisements and the Service. The data are not provided to any third party.

Lawfulness of data management: the data subject has given consent to the processing of his or her personal data for one or more specific purposes, in accordance with (1) a) of Article 6 of GDPR.

Users can give their consent to the application of cookies by clicking on a given button of a pop-up window when using the Website.

Users have the right to revoke the consent they have given to the processing of their personal data or parts of their personal data any time by sending an e-mail to [info@trendency.hu](mailto:info@trendency.hu) or a letter to 1092, Budapest, Knézich u. 2. The consent does not affect the legality of data management before revoking the consent.

Users can delete cookies placed on their computer and can block the application of cookies in their browser. The "Help" function in most browsers explains to users the ways to not allow cookies, to not accept new cookies and how to instruct your browser to set new cookies and turn off cookies.

In case users do not consent to the application of cookies, users cannot fully use the Service and the web analytics measurements will be inaccurate as a consequence.

Duration of data management: after revoking consent 30 days, with consent 5 years.

c) During subscription and browsing, the IP address of a user's computer, the start and end of browsing, and, in some cases, the type of the browser and the operational system depending on computer settings are automatically stored.

Purposes of data management: the data saved in the log file are used for statistical purposes and are not in connection with the personal data of users.

Lawfulness of data management: when managing the Website, Data manager's processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child, in accordance with (1) f) of Article 6 of GDPR.

Duration of data management: for a time period required by the proper functioning of the Website.

## **4. Data subject rights**

4.1. Rights of the data subject to be provided information: where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all the information necessary according to Article 13 and 14 of GDPR, as well as Articles 15-22 and Article 34 of GDPR.

The data subject can require the provision of information relating to the management of their personal data by Data manager by sending a letter to the contact information of Data manager (in 1.).

4.2. Right to access: the data subject has the right to be given information by Data manager relating to whether the management of their personal data is in progress. In case the management of their personal data is in progress, the data subject has the right to access the personal information and the following information: purposes of data management; categories of the personal data of the data subject; addressees and categories of addressees that are or will be provided with the personal data information; the duration of storing the data subject's personal data; the rights the data subject has (correction, deletion, protest, blocking data management), the right to file a claim to the local authorities; the information relating to data sources and the right of automated decision-making and profiling.

To the request of the data subject, Data manager provides the copy of the personal data relating to the data subject; for the first time free of charge and later for a reasonable fee.

4.3. Right to erasure: In 30 days after receiving data subject's request to erase their personal data, Data manager erases them in case the data subject observes (1) of Article 17 of GDPR: The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: e.g. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); the personal data have been unlawfully processed, the personal data must be erased.

Data manager, in accordance with (3) of Article 17 of GDPR: Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: e.g. for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; can deny the erasure of the personal data of the data subject.

4.4. Enforcement of the law: data subjects may directly contact Data manager in case they have complaints or claims by sending a letter to the contact information of Data manager defined in 1.

Data manager will do everything in their power to prevent and correct any aggrievement. Data subjects have the right to seek redress and bring legal proceedings to the local courts or the Hungarian National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c) in case their rights are violated.

## **5. Data management and data transfer protocols and data security**

5.1. Without the prior written consent of data subjects, their personal data cannot be provided to third parties unless they are required by the

competent courts or authorities for law enforcement purposes or in case Data manager commissions a third party to provide Services.

5.2. Data manager does everything in its power to guarantee adequate data security and protection, as well as proper technical and management processes regarding the technological and scientific circumstances, the scope, the circumstances and purposes of data management, the rights and freedoms of individuals against unlawful access, alteration, transfer; unlawful publication, erasure or deletion, as well as accidental elimination, injury and unavailability.