DATA HANDLING INFORMATION FOR THE CAROLA WEBSITE

1. DATA CONTROLLER: Salt Communications Kft.

Address:	1012 Budapest, Logodi u 44/B.
Telephone:	+06 1 201 5666
Website:	www.salt.hu
Representative:	Kata Molnár-Bánffy

2. **REGULATIONS SERVING AS BASIS FOR DATA HANDLING**

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 - GDPR);

 Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

3. SCOPE AND DURATION OF PERSONAL DATA HANDLED, THOSE AFFECTED

USER: any natural person taking advantage of the services of the website (reading news and information material), furthermore, viewing the website.

4. OBJECTIVES, LEGAL BASIS FOR DATA HANDLING

OBJECTIVES OF DATA HANDLING:

online content service-provision maintaining contact with the User

The Data Controller may not use the personal data provided for purposes other than those designated above.

LEGAL BASIS FOR DATA HANDLING: voluntary consent as determined in Article 6 (1) a) of GDPR, which comes about on the basis of the written declaration of the User based on voluntary, prior, appropriate information. The User shall be entitled to withdraw consent at any time, although such withdrawal does not affect the legality of data handling prior to withdrawal of consent.

The User warrants that during the course of using the services of the website, he/she obtained the consent of the concerned natural person for the handling of personal data given about other persons or made accessible by the User. All user content uploaded to the services and shared by the User is the full responsibility of the User.

The Data Controller shall not check the given personal data. The person providing such data is exclusively responsible for their accuracy.

User personal data of a natural person who has not yet reached the age of 16 years may be handled only in the case of the consent of an adult exercising parental control over such a person.

DURATION OF DATA HANDLING:

- In the case of e-mails sent by the User, inasmuch as the User does not have registration, the contacted Data Controller deletes the e-mail address on the 90th day after closure of the case in the request, with the exception where, in a one-off case, it is in the lawful interest of the Data Controller to continue handling the personal data, during the existence of this lawful interest of the Data Controller.

- The handling of personal data given by the User remains until the User unsubscribes from the service – with the given User's name – or otherwise requests deletion of personal data. In this case, the personal data are deleted from the systems of the Data Controller.
- During the operation of the system, data automatically and technically input are stored in the system, calculated from generation until the time justified from the point of view of the provision of the operation of the system.

AUTOMATICALLY COLLECTED DATA: Those data of the registered computer, mobile device of the User, which are generated during the use of the website and which are input by the system of the Data Controller as an automatic result of the technical processes, thus specifically, the Internet Protocol (IP) address, the type of browser, language setting, operation system, internet service provider (ISP) and time stamp.

The website automatically logs data being input automatically on entry and exit without the separate declaration or action of the User. These data cannot be associated with other personal user data, with the exception of cases made mandatory by law. The Data Controller has exclusive access to the data.

During the operation of the system, data automatically and technically input are stored in the system, calculated from their generation until the time justified from the point of view of the provision of the operation of the system.

5. USE OF DATA PROCESSOR, DATA FORWARDING

The services of another Data Processor can be used in order to carry out the activities of the Data Controller.

TYCMO Kft.

(2053 Herceghalom, Patak utca 1.)

The Data Processor does not have independent right of decision, it is authorized to proceed exclusively is accordance with the contract signed with the Data Controller and on the basis of the instructions received. After **31 May 2019**, the Data Processor shall register, handle and process personal data forwarded to it by the Data Controller and handled or processed by it in compliance with the provisions prescribed by the GDPR, and shall make a declaration thereto for the Data Controller.

The Data Controller shall monitor the work of the Data Processor.

The Data Processor shall not be entitled to make use of other data processors.

The Data Controller is entitled and required to forward all Personal Data it has access to and that it stores properly to the competent authorities, inasmuch as legal regulation or legally confirmed ruling of an authority obliges the forwarding of such Personal Data by the Data Controller. The Data Controller shall not be held responsible for such data forwarding, respectively, consequences deriving thereto.

Data are not forwarded to a third country or any international organization.

6. DATA SECURITY MEASURES

The Data Controller stores personal data on its own server. The Data Controller uses the services of another company/companies for storage of data (see two data processors designated in point 4.). The Data Controller and the Data Processors used ensure through appropriate measures that the personal data are protected from, among others, unlawful access by third parties.

7. RIGHTS OF USERS IN RELATION TO DATA HANDLING

Right for request of information

The User can request information through the contacts given in point 1. about what personal data of the User, on what legal basis, for what data handling purpose, from what resource, for how long they are handled, respectively, the Data Controller provided access to whom, when and on the basis of what legal regulation, and which personal data, or to whom the Data Controller forwarded the personal data of the User.

The Data Controller shall fulfil the demand for information of the User maximum within one month of the request, sending it to the contact given by the User.

Right for correction

The User can request that the Data Controller modify any of the personal data of the User through the contacts given in point 1. The Data Controller shall fulfil the request of the User maximum within one month, and shall notify the User thereto at the contact given by the User.

Right for blocking (restriction of data handling)

The User can request through the contacts given in point 1. that the Data Controller block the personal data of the User (by the clear designation of the restricted character of the data handling and with the provision of handling separated from other data). The blocking shall last while the reason indicated by the User makes storage of the data necessary.

Right to object

The User can object to data handling through the contacts given in point 1., if according to his/her standpoint, the Data Controller would inappropriately handle his/her personal data in connection with the purpose designated in the current data handling information. In this case, the Data Controller shall be required to certify that the handling of personal data is justified by such compelling legal reasons that take priority over the interests, rights and freedoms of the concerned party, or which are related to the submission, assertion or protection of legal requirements.

Right to deletion

The User can request deletion of his/her personal data through the contacts given in point 1. Deletion can be denied (i) for the purpose of the exercise of the right to freedom of expression and information, or (ii) if legal regulation gives authorization for handling of personal data; and (iii) the submission, assertion or protection of legal requirements.

The Data Controller shall inform the User in every case on the denial of a request for deletion, giving the reason for denial of deletion. Following fulfilment of a request for deletion of personal data, earlier (deleted) data cannot be restored.

Newsletters despatched by the Data Controller can be cancelled using the unsubscribe link contained in the newsletters. If the newsletter is unsubscribed, the Data Controller shall delete all personal data of the User contained in the database of the newsletter.

8. OPPORTUNITIES FOR LEGAL REDRESS IN RELATION TO DATA HANDLING

In the event of data handling judged to be unlawful, the person concerned

 can submit a complaint to the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), Hungarian National Authority for Data Protection and Freedom of Information, address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, postal address: 1530 Budapest, Pf.: 5. E-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu or there is the opportunity, in the interest of the protection of data, to approach the courts, which shall deal with the matter without delay. In this case, the person can freely decide whether to submit the claim at the court competent for his/her residence (permanent residence) or abode (temporary residence), or the registered office of the data controller. Courts competent for residence or abode can be searched at the following website: http://birosag.hu/ugyfelkapcsolatiportal/.

9. CHANGES TO THE INFORMATION

The Data Controller retains the right to modify, unilaterally, the current information at any time.

The User accepts the currently prevailing provisions of the information on next entering the website. Other than this, there is no requirement to seek the consent of individual Users. The currently prevailing information can be accessed at the following link: www.carola.hu Last update: 31 May 2019