

Privacy Policy
relating to the use of cookies

I. Name and address of the controller

Company name:	TREFFA Erdészeti Szolgáltató, Utazásszervező és Kereskedelmi Korlátolt Felelősségű Társaság
Seat:	HU-4374 Encsencs, Bélteki u 103.
Company registration number:	15-09-068445
Tax number:	13065638-2-15
Represented by:	János Pál Trefán
	János Pál Trefán

II. Legal Bases for Processing Personal Data

The following laws apply to data processing:

- Present Text of 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:
<https://eur-lex.europa.eu/legal-content/HU/TXT/PDF/?uri=CELEX:32016R0679&from=HU>
- Present text of the Law CXII of 2011 on the right to self-determination as regards information and freedom of information (hereinafter: Privacy Act):
<https://net.jogtar.hu/jogszabaly?docid=A1100112.TV>
- Present text of Law No XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities:
<https://net.jogtar.hu/jogszabaly?docid=A0800048.TV>
- Present text of the Law CLV of 1997 on consumer protection:
<https://net.jogtar.hu/jogszabaly?docid=99700155.TV>

III. Information regarding data processed

Scope of personal data processed by the controller: online identifier of the data subject.

Legal basis for data processing: the data subject's consent.

Duration of the processing of the data: until the withdrawal of consent

IV. About cookies in general



(1) Cookies are short data files placed by the visited homepage on the computer of the user. The aim of the cookies is to make the given internet services relating to information and communication easier and more convenient. They have several types, but they can be classified in two large groups in general. One of them is the temporary cookie, which is placed on the computer of the user only during a specific work process (e.g. during the security identification of an internet banking process). The other kind is the permanent cookie (e.g. language settings of a website), which remains on the computer of the user until it is deleted. Based on the directives of the European Commission, cookies can be placed on a user's device only with their permission [except if they are essential to the use of the service].

(2) In the case of cookies that do not require the consent of the user, information must be provided when the website is visited for the first time. It is not necessary to display the full text of the information for cookies on the website, it is enough that the operators of the website give a brief summary of the essence of the information, by referring to the access details of the full information via a link.

(3) For cookies requiring a consent the information can connect also to the first visit of the website if the data processing associated with the use of cookies begins already by the visiting of the website. If cookies are used in connection with the use of a function specifically requested by the user, the information may also be displayed in connection with the use of this function. In this case, it is not necessary to display the full text of the information for cookies on the website, a brief summary of the essence of the information is enough, and provide a link to access the full policy.

(4) The visitor must be informed about use of cookies. With this information, the controller shall ensure that before and during the use of information society services of the website, that the user can learn at any time which data types are processed for which data processing purposes, including the processing of data that cannot be directly related to the user.

V. *Cookies used*



The data Controller informs its users that it uses Google Analytics, Google Remarketing, AdWords Conversion Tracking and Facebook Remarketing programs to measure the website and subpages hits and to monitor the behaviour of the users, to generate statistics and for the advertising efficiency. The above-mentioned programs place cookies on the users' computers that collect user data. Visitors to the website (data subjects) allow the controller to use Google Analytics, Google Remarketing, AdWords Conversion Tracking and Facebook Remarketing programs. They also contribute to the monitoring, tracking and use of all services provided by the programs to the controller. In addition, the user has the possibility to disable the data recording and storage of cookies at any time for the future as described below.

We inform our users that the settings and use of Google Analytics, Google Remarketing, AdWords Conversion Tracking and Facebook Remarketing programs fully comply with the requirements of the data protection authority. According to Google, Google Analytics uses primarily first-party cookies to report visitor interactions on the website. These cookies only record information that cannot be used to identify persons. Browsers do not share their own cookies between domains. For more information about the cookies, see the Google Advertising and Data Privacy FAQ.

V.1. Google Analytics:

The controller uses the Google Analytics program primarily for the production of its statistics, including measuring the effectiveness of its campaigns. By using the program, the controller mainly receives information about how many visitors have visited the website and how much time visitors spent on the website. The program recognizes the IP address of the visitor, thus can see if the visitor reaches the website for the first time or not, furthermore the program is able to follow the route taken by the visitor, including the pages the visitor has entered.

V.2. Google Remarketing:



In addition to the usual data of Google Analytics, the controller uses the Google Remarketing Program to collect the data of the DoubleClick cookie. The remarketing service can be used through the DoubleClick cookie, which primarily ensures that visitors to the website will later see the advertisement of the controller on free Google advertising surfaces. The controller uses the programme of Google Remarketing for its online advertisements. The controller's advertisements are also shown on websites of external service providers, such as Google. The controller and external service providers, such as Google, use their own cookies (such as Google Analytics cookies) and third-party cookies (such as DoubleClick cookies) together to gain information on previous visits on the website by users and to optimise and display advertisements.

V.3. Google AdWords Conversion Tracking:

The purpose of Google AdWords Conversion Tracking is to enable the controller to measure an ad's effectiveness. This is done using cookies placed on the user's computer, which exist for 30 days and does not collect personal data.

V.4. Facebook Remarketing

The controller uses the Facebook remarketing pixel to increase the effectiveness of Facebook ads for the purpose of creating a so-called remarketing list. The external service provider, such as Facebook, displays advertisements on websites after visiting the website. Remarketing lists are not suitable for personal identification. These lists do not contain the personal data of visitors, only the browsing software is identified.

V.5. Disabling cookies

If you want to manage the cookie settings or disable this feature, you can do this on your own computer in the browser. This option is available depending on your browser's toolbar in the section Cookies/Cookies/Tracking functions, but you can



usually set the tracking features on your computer under Tools > Settings > Data protection settings.

Users who do not want Google Analytics to report on their visits can install the Google Analytics opt-out browser add-on.

If you want to disable the web activity of Analytics, visit the page for disabling Google Analytics, and download the add-on for your browser. For further information about installing and removing the add-on see the Help function of the given browser.

VI. *Access to data and data security measures*

VI.1. Access to data and data transfer

The personal data provided by you may be accessed by the controller's staff in order to perform their tasks.

The controller shall transfer the personal data processed to its subcontractors as set out in the Appendix to this Policy.

The controller will transfer your personal data only exceptionally to other controllers and public bodies not listed in the Annex.

For example, if

- court proceedings are initiated in a case concerning you and it is necessary for the court to hand over the documents containing your personal data
- the police contacts the controller and requests the transmission of documents containing your personal data for the investigation.

VI.2. Data security measures

The controller shall store the personal data provided by you on the servers of the controller or, where appropriate, in printed form in his archive. The controller does not use the services of another company for the storage of personal data.

The controller shall take appropriate measures to protect personal data among other things against unauthorized access or unauthorized alteration. For example, the controller logs the access to the personal data stored on the server, so it is always possible to check who, when and what kind of personal data has been accessed.

VII. *Rights of the data subject relating to data processing*



1. Your access rights

As an authorised person you have the right to access to all your personal data.

If you request that the controller to provide feedback if he processes your personal data, he is obliged to provide information about the following:

- (a) what kind of personal data,
- (b) on what legal basis,
- (c) for what kind of purpose of data processing,
- (d) from what source,
- (e) and how are processed.

The right to obtain feedback whether the controller processes your personal data (or not),

- (a) covers the personal data relating to you;
- (b) does not cover anonymous data;
- (c) does not cover personal data not relating to you; and
- (d) covers pseudonymised data that can be linked explicit to you.

The controller shall provide you with access to and a copy of your personal data at your request. If you request an additional/repeated copy of your personal data, the controller may charge a reasonable fee to pay the administrative expenditure connected with the fulfilment of the request, and you have to pay this fee.

2. Your right of rectification

You are entitled to request the rectification of your personal data.

This right

- (a) does not cover anonymous data;
- (b) covers the personal data relating to you;
- (c) does not cover personal data not relating to you; and
- (d) covers pseudonymised data that can be linked explicit to you.

The controller shall correct or supplement your personal data on the basis of your request accordingly. The controller shall inform the recipients of the personal data (if any) about the correction of your personal data. However, the controller shall not inform the recipients about the rectification of the personal data if informing the recipients seems to be impossible or if this would involve disproportionate effort.

3. Right to erasure

Under certain conditions, you are entitled to request the deletion of your personal data.

The controller is obliged to delete your personal data without undue delay, if



- (a) the controller processes such personal data and
- (b) you request the deletion of your personal data, and
- (c) the personal data are not necessary for the purposes for which the controller processes the personal data.

The controller is obliged to delete your personal data without undue delay, if

- (a) the controller processes your personal data, and
- (b) you request the deletion of your personal data, and
- (c) you withdraw your consent on which the processing of your data is based, and
- (d) there is no other legal basis for further processing of your data.

The controller is obliged to delete your personal data without undue delay, if

- (a) the processing is necessary for the purposes of the legitimate interests pursued by a controller or by a third party, and
- (b) you object to the processing of your personal data by the controller, and
- (c) the legitimate reason for the processing of such personal data shall not prevail over your objection.

The controller is obliged to delete your personal data without undue delay, if

- (a) you request the deletion of your personal data, and
- (b) the processing of such data by the controller is not unlawful, or
- (c) deletion is mandatory under applicable law, or
- (d) your data is collected in relation to information society services.

The controller shall inform the recipients of the personal data (if any) about the deletion of your personal data. However, the controller shall not inform the recipients about the deletion of the personal data if informing the recipients is impossible or if this would involve disproportionate effort.

4. Right to restriction of processing

You have the right to request the restriction of the processing of your personal data.

You have the right to request the restriction of the processing of your personal data

- (a) does not cover anonymous data;
- (b) covers the personal data relating to it;
- (c) does not cover personal data not relating to you; and
- (d) covers pseudonymised data that can be linked explicit to you.

The controller restricts the processing of your personal data for the period in which the controller controls the accuracy of such data, if you request the restriction of the processing of your personal data, and if you dispute the accuracy of such data

The controller restricts the processing of your personal data, if you request the restriction of the processing of your personal data, the processing of which is unlawful and you are against the deletion of such data.

The controller restricts the processing of your personal data, if

- (a) you request the restriction of your personal data, and



- (b) the controller no longer needs the data for the purposes of the processing, and
- (c) you require your data for the establishment, exercise or defence of legal claims.

The controller restricts the processing of your personal data, if

- (a) you object to the processing of your personal data which is necessary for the purposes of the legitimate interests pursued by the controller, and
- (b) you are waiting for confirmation that there are legitimate reasons for the processing of your personal data by the controller, which shall not prevail over your objection.

The controller shall inform the recipients of the personal data (if any) about the restriction of your personal data. However, the controller shall not inform the recipients about the restriction of the personal data if informing the recipients seems to be impossible or if this would involve disproportionate effort.

If the controller restricts the processing of your personal data, then

- (a) the controller may store such personal data,
- (b) the controller may process such personal data on the basis of your consent,
- (c) the controller may process the personal data for the establishment, exercise or defence of legal claims or for the protection of the rights of a person.

5. Right to data portability

You have the right to receive the personal data relating to you, which you have provided to the controller, in a structured, commonly used and machine-readable format, and the right to transmit it to another controller without hindrance from the controller to which the personal data have been provided (if it is technically possible), if the processing is based on consent or it is necessary for the performance of the contract and the data is processed automated.

Your right to data portability

- (a) does not cover anonymous data;
- (b) covers the personal data relating to you;
- (c) does not cover personal data not relating to you; and
- (d) does not cover clearly pseudonymised data.

6. Deadline for processing your request as a data subject

The controller shall respond to requests concerning the rights of the data subject in accordance with the above without delay, but no later than within one month.

7. Right to lodge a complaint

If you believe that your rights have been violated, the controller recommends that you initiate a consultation with the controller through direct contact with the controller. If such discussion does not lead to conclusion or if you do not wish to participate in such

activities, you may take action in Nemzeti Adatvédelmi és Információszabadság Hatóság (national authority for data protection and freedom of information, ‘the authority’). In the event of initiating a legal proceeding, you may decide to bring the proceedings in the court competent at the residence or place of stay.

The contact details of Nemzeti Adatvédelmi és Információszabadság Hatóság (national authority for data protection and freedom of information, ‘the authority’) are as follows: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.; phone: +36 1 391 1400; fax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu

8. Amendments to this Privacy Policy

The controller reserves the right to modify this Privacy Policy at any time. The controller shall inform the customers of such changes by letter or e-mail and in all cases in accordance with the relevant legislation.

