

Privacy policy for visitors to the website nyilvantartok.hu

1. Information on joint data processing

We inform the persons visiting the nyilvantartok.hu website (hereinafter: website) (hereinafter: visitor) that we have reviewed our activities related to the processing of personal data in terms of the mandatory and applicable rules prescribed in the European Union General Data Protection Regulation (hereinafter: GDPR), and in accordance with Article 26 of the GDPR, we have determined that we are a joint data controller with respect to the data processed on the website as follows.

Joint data controller on the one hand

name: Govern-Solution Kft.

address: 1052 Budapest, Szervita tér 8.

tax number: 26327453-2-17

on the other hand,

name: GOVERN-SOFT Kft.

address: 7030 Paks, Váci M. u. 3. fsz/2.

tax number: 14268339-2-17 (hereinafter collectively: Data Controllers).

In view of this, we have entered into an agreement with each other, in line with the requirements of the GDPR, on our responsibilities for fulfilling our data controller obligations under the GDPR, as well as our role towards data subjects. We would like to inform you about the essential elements of this agreement with this Privacy Policy.

2. General provisions

As joint Data Controllers, we are committed to carrying out our activities related to the processing of personal data in accordance with the requirements set out in the GDPR Regulation and in domestic legislation in force.

Regarding the nyilvantartok.hu website, the Data Controllers respect the informational self-determination of visitors.

The Data Controllers hereby inform the website visitors about the data protection and data management principles set out in the GDPR Regulation, their practices in the processing of personal data, their organizational and technical measures taken to protect data, as well as the rights of visitors in this regard and the possibilities for enforcing them.

The present form of the Data Protection Notice entered into force on May 3, 2022 and is valid until revoked. The Data Controllers reserve the right to unilaterally change or modify the Data Protection Notice. This may take place in particular if the scope of services is expanded or if a law or a binding legal act of the European Union makes it mandatory. Changing the data management may not mean processing of personal data for a different purpose. Data controllers guarantee that the visitor can always access and familiarize himself with the Data Controllers' effective Data Protection Notice on the website.

We also inform the visitor that this Data Protection Notice contains information only on the processing of personal data processed on the above-mentioned nyilvantartok.hu website. Information on the processing of personal data on websites accessible from the website, operated by one or another Data Controller, but considered a separate website (a page with a different domain name), can be found in the respective website's own Data Protection Notice.

3. Applied legislation

Data controllers undertake to process personal data in accordance with the legal requirements in force at all times, in particular the ones listed below:

- 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, also known as GDPR: General Data Protection Regulation, and repealing Directive 95/46/EC
- Act CXII of 2011 (Infotv.) on the right to informational self-determination and freedom of information
- Act C of 2003 on electronic communications
- Act CXIX of 1995 on the processing of name and address data for the purpose of research and direct marketing
- Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (mainly Section 13/A)
- Act XLVII of 2008 on the prohibition of unfair commercial practices towards consumers
- Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities (especially Section 6)
- Act V of 2013 on the Civil Code
- Act LIV of 2018 on the protection of business secrets
- Act XXXIV of 2004 on the protection of business secrets Act on Small and Medium-Sized Enterprises and Support for Their Development
- Act CLV of 1997 on Consumer Protection

4. Name and contact details of the data controller

4.1. Data Controllers' details and contact information:

Name: Govern-Solution Kft.
Address: 1052 Budapest, Szervita tér 8.
Registration number: 17-09-011626
Tax number: 26327453-2-17
Representative: Zuschlag János
Phone number: +36/75-675-454
Email: info@govern.hu

Name: GOVERN-SOFT Kft.
Address: 7030 Paks, Váci M. u. 3. Fsz.2.
Mailing address: 7031 Pf. 98.
Registration number: 17-09-006385
Tax number: 14268339-2-17
Representative: Zuschlag János
Phone number: +36/75-675-454
Email: info@govern.hu
Web: <https://govern.hu/>

4.1. Contact details of the data controller's data protection officer

E-mail: adatvedelem@govern.hu

5. General information on joint data processing

Data controllers declare that they have agreed as follows regarding the processing of personal data on the website nyilvantartok.hu, as detailed below.

Data controllers determine the data processing purposes, the scope of the data processed, the legal basis and the duration of the data processing related to the data processing detailed in point 6, jointly, to the same extent and with equal responsibility.

6. The scope of data processed on the nyilvantartok.hu website

Anyone can view the public content of our website without providing personal information; it is not tied to registration or login.

6.1. Cookies used when viewing the nyilvantartok.hu website

When you visit our website, we store or collect information about your browser, after prior information from you as a visitor, using cookies (hereinafter: cookies). The information may relate to you as a visitor, your preferences, the device you use or to ensure the expected operation of the site. The information is generally not suitable for direct identification of the visitor, but it can provide the visitor with a personalized internet experience.

Since we respect your rights to the protection of personal data, the visitor decides whether to allow the use of certain types of cookies. You can make the settings for cookies during your first visit to our website. If you wish to modify these settings later, you can do so by clicking on Cookie settings.

6.1.1. Functionality cookies

Purpose of data processing

These cookies are necessary for the operation of the nyilvantartok.hu website. They are placed in response to activities such as requesting services, they help make our website usable by enabling basic functions such as navigating the site and accessing secure areas of the website. Without this, we cannot provide the visitor with information about what types of cookies they have enabled or disabled when viewing the website. The purpose of data management is to ensure the proper functioning of the website for the visitor, to allow visitors to access the website's menu system and thus to learn about the services offered by the Data Controllers.

Scope of processed data

- cookie for managing privacy settings (cookies-accepted)
- cookie containing session data (PHPSESSID)

Legal basis for data processing

The Data Controller's legitimate interest pursuant to Article 6(1)(f) of the GDPR. The Data Controller processes this data based on the results of a balancing test in order to ensure fair and lawful processing.

Duration of data processing

Cookies that manage privacy settings are always stored for 1 year. The cookie containing session data is automatically deleted when the browser is closed or after 20 minutes of inactivity. However, the

visitor can delete his own cookies at any time, restrict or delete cookies in the Settings, Privacy and Security menu item.

6.1.2. Analytical cookies

These cookies are used to summarize visits to our nyilvantartok.hu website and the sources of traffic. The information collected by cookies is aggregated, summarized, and therefore anonymous. We collect and analyze analytical cookies using Google Analytics. You can restrict or disable the use of the tool at <https://adssettings.google.com/authenticated>. You can read about the protection of personal data and Google's terms of service here: <https://policies.google.com/privacy?hl=hu>.

Purpose of data processing

Identifying and distinguishing users visiting the nyilvantartok.hu website, and monitoring the visitor's browsing events on our website for the purpose of preparing statistics and analyses.

Scope of processed data

- date and time of visit
- browser data used by the visitor (e.g., browser window resolution, language settings)
- the resolution of the visitor's display
- location based on the visitor's IP address
- pages visited and time spent on them, and where they came from
- whether Java is enabled
- which Flash version the visitor is using

Legal basis for data processing

The data subject's voluntary, informed consent pursuant to Article 6(1)(a) of the GDPR.

Data processing period

The duration of handling analytical cookies can be divided into three groups. Cookies of the `_gat_gtag_G-PQMHH5761X` type are stored for 1 minute, cookies of the `_ga` type for 2 years, while cookies of the `_gid` type are stored for 24 hours. It is also true in the case of these cookies that the visitor can delete his own cookies at any time, he can limit or delete cookies in his browser in the Settings, Privacy and Security menu.

6.1.3. Performance cookies

Performance cookies are used to understand and analyze key performance indicators of the website, which helps provide a better user experience for visitors.

Purpose of data processing

These cookies are used to summarize visits to our site and the sources of traffic in order to measure and improve the performance of our site. They are used to monitor the movement of visitors on the site. The information collected by cookies is aggregated, summarized and therefore anonymous. If you do not allow the use of these cookies, we will not be notified that you have visited our site.

Scope of processed data

- date and time of visit
- data from the browser used by the visitor
- location based on the visitor's IP address
- time spent on the website

Legal basis for data processing

The data subject's voluntary, informed consent pursuant to Article 6(1)(a) of the GDPR.

Data processing period

The duration of performance cookies is 1 year.

6.1.4. Functional cookies

Functional cookies help us perform certain functions, such as sharing website content on social media platforms, collecting feedback and other third-party functions.

Purpose of data processing

Displaying advertisements relevant to your interests outside the website and on the data controllers' social media platforms.

Scope of processed data

- date and time of visit
- data from the browser used by the visitor
- location based on the visitor's IP address
- pages visited and time spent on them

Legal basis for data processing

The data subject's voluntary, informed consent pursuant to Article 6(1)(a) of the GDPR.

Data processing period

The duration of data management, depending on the cookie, is 2 years, 90 days, 24 hours, 1 minute, until the end of the session,

6.2. Data processed for the purpose of requesting a quote

Data controllers provide the opportunity to answer questions related to the request for quotation via the nyilvantartok.hu website. The request for quotation is completely voluntary and is based on the consent of the client. We would like to draw the visitor/client's attention to the fact that this Privacy Policy only contains information related to questions related to the request for quotation on the nyilvantartok.hu website. Please note that you can view the information on the data management and data protection of other websites accessible from this website, regarding the data processed for the purposes of questions related to the request for quotation, under the Privacy Policy menu item of the given website.

Purpose of data processing

The purpose of processing personal data provided to the Data Controller via the offer form is to enable the client to ask questions related to the offer, and for the Data Controllers to provide the offer to the client and answer questions related to the request for a quote. The personal data is processed for the purpose of providing the offer and answering questions related to it.

The Data Controllers use the personal data provided during the request for a quote exclusively for communication purposes related to the subject specified in the offer form.

The Data Controllers do not make the personal data accessible to other visitors to the website.

The Data Controllers do not use the personal data provided in this way for any other purpose and treat it confidentially.

The Data Controllers inform the client that Govern-Solution Kft., as the owner of the service, is authorized to submit a quote. However, any data controller, their employees, or other persons in a legal relationship with them to work with them are authorized to communicate related to the offer or to answer questions related to the offer.

Scope of processed data

- name of the contracting authority (contact person)
- email address of the contracting authority (contact person)
- telephone number of the contracting authority (contact person)

Legal basis for data processing

The data subject's voluntary, informed consent pursuant to Article 6(1)(a) of the GDPR.

Duration of data processing

If the client has consented to us processing their personal data for the purposes of answering questions related to the request for proposal, we will store this data as long as it is necessary to achieve the purpose and the client does not withdraw their consent unless otherwise provided.

6.3. Data processed for contact purposes

Visitors to our website nyilvantartok.hu can find out about the electronic or postal addresses of the Data Controllers under the Contact menu item. We also process personal data regarding inquiries received to the contact details provided here as follows.

Purpose of data processing:

The purpose of processing personal data provided to the Data Controllers electronically or by post is to enable the data subject to contact the Data Controllers' employees or other persons in a legal relationship for work, and for the Data Controllers to respond to the data subject's request. Personal data is processed for the purpose of communication related to the request made by the data subject.

The Data Controllers use the personal data provided in the course of such a request exclusively for the purpose of communication that is the subject of the request and related to it.

The Data Controllers do not use the personal data provided in this way for a purpose other than the purpose stated in the request and treat it confidentially.

The Data Controllers do not record telephone calls, so no audio recording is made of the data subject. Your personal data are not recorded or stored. If necessary, we request written contact at the initiative of the data subject.

Scope of processed data

Since these requests cannot be classified, the scope of the processed data may vary, and in each case it only includes the data sent by the data subject to the Data Controllers.

When a request is received by post, we typically process the following data:

- sender name
- sender address

In the case of an inquiry received electronically, by e-mail, we typically process the following data:

- name of the person concerned
- email address of the person concerned

Legal basis for data processing

The data subject's voluntary, informed consent pursuant to Article 6(1)(a) of the GDPR.

Duration of data processing

Depending on the subject of the request, but only until the purpose of the data processing is achieved, the personal data provided will be processed.

6.4. Social media data management

Purpose of data processing

On the facebook.com page, GOVERN-SOFT Kft. (hereinafter: Organization), as the data controller involved in joint data management, analyzes anonymous statistics prepared by facebook.com based on the activities, structure, visitors reached during the presentation of novelties, news, and events related to the Organization, and their activities on the Organization's social page.

Scope of processed data

The Organization receives the personal data of those who like its social media page and comment on its posts anonymously based on the data collected by the facebook.com website. Accordingly, the Organization and facebook.com are considered joint data controllers with respect to this data. The Organization exclusively entrusts the facebook.com social media page, as the operator, with the task of preparing statistics for it. For this purpose, facebook.com places cookies on the computers of visitors to the Organization's social media page. The data of the data subject thus processed is determined by the regulations of the facebook.com social media page in relation to the social media page. You can read more about this here: <https://www.facebook.com/about/privacy> and here <https://www.facebook.com/policies/cookies/>.

Legal basis for data processing

The data subject's voluntary, informed consent pursuant to Article 6(1)(a) of the GDPR.

Duration of data processing

Data management is carried out on facebook.com. The duration and method of data management, as well as the possibilities for deleting and modifying data, are subject to the rules/regulations of the facebook.com social network. Visitors can check, modify, restrict or disable data management settings at the two links below. <https://www.facebook.com/about/privacy>, <https://www.facebook.com/policies/cookies/>

7. Scope of access to data, data transfer

The data managed on the website nyelvintartok.hu may only be accessed by the Data Controller's employees and other persons in a legal relationship with the Data Controller.

We do not disclose your personal data to those who are not authorized to view them, and we will only forward them to third parties if you have given your prior consent. An exception to this may be an official investigation, in which case we are obliged to provide the data necessary for the purpose of the request upon official request by the acting authority (e.g. police, prosecutor's office, court, etc.). Your separate consent is not required for this, as this is our task specified by law.

8. Visitor and user (hereinafter: data subject) rights regarding the processing of their personal data

During their data processing activities, the Data Controllers ensure the enforcement of the rights of the data subject in accordance with the provisions of the GDPR and the Infotv. As joint Data Controllers, we inform the data subjects that they may enforce their data subject rights against any data controller pursuant to Article 26(3) of the GDPR.

8.1. Right of access and information

Any data subject may request information about the processing of their personal data. The Data Controllers will inform the data subject within 1 month of receiving the data subject's request. Unless the data subject has expressly stated otherwise in their request, information and access will be primarily provided by Govern-Solution Kft.

The data subject has the right to information regarding the following:

- whether your personal data is being processed, and if such processing is in progress, you have the right to know what personal data the Data Controllers process, on what legal basis, for what purpose and for how long
- to whom, when, on the basis of what law, access to which personal data was provided by the Data Controllers, or to whom your personal data was transferred
- from what source the processed personal data originates
- whether the Data Controllers use automated decision-making and its logic, including profiling

At the request of the data subject, the Data Controllers shall provide access to the personal data that are the subject of the data processing, and the data subject may request a copy of them. The right to request a copy may not adversely affect the rights and freedoms of others.

8.2. The right to rectification

The data subject has the right to request clarification, modification, or completion of all personal data subject to data processing from any Data Controller. The Data Controllers shall take action on the correction and send feedback without undue delay.

8.3. Right to restriction of data processing (blocking)

The data subject has the right to request the restriction of data processing from any Data Controller if:

- requested the correction of your personal data, for the duration of the verification of the accuracy of the data
- in the event of unlawful data processing, if the data subject opposes the deletion of the data and instead requests the restriction of their use

- despite the data processing purpose having ceased, the data subject requires them for the establishment, enforcement or defence of legal claims
- has objected to the processing of data, in which case the restriction shall apply for the period until it is investigated whether the legitimate grounds of the Data Controllers override the legitimate grounds of the data subject

8.4. Right to data portability

The data subject has the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and to transmit those data to another controller. In certain cases, the data subject may request the direct transmission of his or her personal data between the Data Controllers and another data controller, provided that this is technically feasible and in accordance with the applicable data protection regulations.

The data subject may submit such a request in writing to any data controller, to the mailing address(es) or electronic mail address(es) specified in point 4.

8.5. The right to protest

The data subject has the right to object to the processing of his/her personal data at any time. In this context, he/she may request the deletion or correction of his/her personal data.

8.6. The right to erasure

In addition to the scope of data processing carried out in order to fulfill the legal obligations of the Data Controllers, the data subject has the right to request the deletion of his or her personal data from any data controller if the data subject withdraws his or her consent which is the basis for the data processing. The Data Controllers shall comply with the deletion request without undue delay, if it is well-founded.

9. Data security measures

The data controller stores personal data on a server installed in the server room of Rackforest Informatikai Kereskedelmi Szolgáltató és Tanácsadó Kft., as the service provider.

10. Complaints handling and redress options

As joint Data Controllers, we declare that we will do everything in our power to ensure that the processing of personal data is carried out in accordance with the law. If you feel that we have violated your rights to the protection of personal data and the free movement of data, you should first contact us, as the Data Controllers of the website, at any of the contact details provided in point 4, so that we can remedy any possible violation.

If you feel that despite your notification, we are not stopping our unlawful conduct or practice, in order to enforce your rights related to the protection of your personal data, you can contact the National Data Protection and Freedom of Information Authority (National Data Protection and Freedom of Information Authority, address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf.: 9. e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu) for legal redress, or you can file a complaint with the authority, or you can also enforce your claim before a civil court.

If you have any further questions regarding the protection of personal data, you can ask them at any of the contact details provided in point 4.