PRIVACY NOTICE

Under Articles 13 and 14 of the 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 (hereinafter: GDPR), ***Hajnalka Sándor e.v.*** *(tax number: 69694309-1-25; registration number: 53549664; registered seat: H-3529 Miskolc, Középszer u. 6. 7/2.; hereinafter: Data Controller) provides the following information to the data subjects regarding the processing of personal data.*

The Data Controller processes personal data for purposes arising in connection with its operations, including but not limited to contacting tourists arriving from Korea (hereinafter: Tourists),recording the data of Tourists in compliance with statutory legal obligations, managing documents related to the Data Controller's operations, for invoicing purposes, and fulfilling its contractual obligations.

The company collects and processes personal data in compliance with the law. During the operation of the website, the personal data provided on the contact form or sent to the provided email address (name, email address, phone number) is processed with the aim of providing appropriate services to visitors of the site. The Data Controller declares that it processes personal data in accordance with this privacy notice and complies with applicable rules of law.

The Data Controller only processes personal data that is essential for achieving the purpose of data processing and is suitable for achieving that purpose. Personal data is processed only to the extent and for the duration necessary to fulfill the intended purpose. The Data Controller protects the personal data it processes by all reasonable means.

- Data Controller: *Hajnalka Sándor e.v. (sole proprietor)*

- Data Controller's Address: *H-3529 Miskolc, Középszer u. 6. 7/2.*

- Contact Information of Data Controller: Phone: *+36304036505; Email: sandor.hajnalka.tourguide@gmail.com*

- Legal Basis for Data Processing: *The legal basis for data processing is the consent of the data subject. [Regulation Article 6(1)(a)]; Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information Section 5(1)(a) The consent of the data subject.*

Consent to Data Processing: Upon entering into the contract, the Contracting Party explicitly consents to the processing of their voluntarily provided personal data and its transfer to Partners.

- Scope of Data Subjects: *Contracting parties (Tourists). The scope of data subjects involved in data processing includes visitors to the website who provide personal data for the purpose of contact. The duration of data processing always depends on the specific user purpose, but data is immediately deleted once the originally intended purpose has been achieved. The data subject may withdraw consent to data processing at any time by sending a letter to the contact email address. If there is no legal obstacle to deletion, the data will be deleted.*

- Scope of Processed Data: *The data necessary for fulfilling the Contract, provided by the Contracting Party (Tourist) at the time of entering into the Contract, include: name, ID card number or passport number, place and date of birth, permanent address, place of residence, phone number, email address, in addition, the name of the legal representative. If the contracting party is an agency (not an individual traveler): office (company) name, registered seat, tax number, account number.*

Providing the requested personal data (name, phone number, email address) is essential for communication. Additional data is required in case of order or invoice issuance. The invoices issued by the company for individuals and sole proprietors include mandatory elements regarding personal data as specified in Section 169 of Act CXXVII of 2007 on Value Added Tax: name and address of the buyer, and tax number (for foreign buyers: community tax number) and bank account number.

The personal and sensitive data of Tourists and those in contractual relationships with the company are recorded and processed in accordance with legal requirements and to the necessary extent. We process personal and sensitive data of our clients and Tourists to fulfill legal obligations and legitimate interests.

- Purpose of Data Collection: *Contract conclusion, fulfillment, communication, invoicing, ordering, refunding, and fulfilling other legal obligations.*

SCOPE OF PROCESSED DATA	***PURPOSE OF DATA PROCESSING***
Natural Person's Name / Company Name	*Communication, ordering, invoicing*
Place and Date of Birth	*Administration, identification, communication*
Address	*Ordering, invoicing*
Email Address	*Communication, ordering, invoicing*
Phone Number	*Communication*
Personal ID Card or Passport Number	*Fulfillment of legal identification obligations*
Tax Number and/or Community Tax Number	*Invoicing*
Bank Account Number	*Ordering, invoicing, refunding*

- Authorized Data Processors:

- *Hajnalka Sándor e.v. and her agents*
- *Partner service providers, their employees/agents*

The Data Controller and her agents, as well as the partner service providers and their employees/agents, are authorized to access the data. The data subject may request access to, correction, deletion, or restriction of processing of personal data concerning them, object to the processing of such personal data, and exercise their right to data portability. The data subject may withdraw their consent to data processing at any time, but this shall not affect the lawfulness of data processing based on consent before its withdrawal.

The data subject has the right to submit a complaint with a supervisory authority. The data subject shall not be obliged to provide personal data and shall not suffer any adverse consequences for failure to provide such data. However, some functions of the website may not be available without this data. The data subject has the right to request the Data Controller to rectify supplement, or erasure

inaccurate personal data concerning them without undue delay. The Ddata Ccontroller shall rectify or erase personal data relating to the data subject without undue delay, unless there is another legal basis for the processing.Requests for the erasure or rectification of personal data can be initiated in the following ways::

- *By post: Hajnalka Sándor e.v.; H-3529 Miskolc, Középszer u. 6. 7/2.*
- *By email: sandor.hajnalka.tourguide@gmail.com*
- *By phone: +36304036505*

The financial data of Tourists are processed by the Data Controller and her contracted partners. In case of direct payment to the Data Controller (transfer, cash, or cash substitute), the Tourist's data are processed exclusively by the Data Controller, while for payments made through intermediary sites and financial service providers, the data of Tourists (for communication, ordering, payment, and invoicing) are also processed by the Data Controller's authorized partners (intermediary sites and financial service providers) according to their data processing policies.

Authorized Data Processing Partners:

DATA CONTROLLER	***SCOPE OF PROCESSED DATA***	***PURPOSE OF DATA PROCESSING***
Booking.com	*Name, address, phone number, email address, credit card details*	*Communication, ordering, guarantee, invoicing*

- Data Processing Duration*: Duration of theContract+ 5 year*

The data processed by Hajnalka Sándor e.v. are retained for the period specified by law. Data for which no retention period is specified by law will be deleted once the purpose has been achieved.

- Mode of Data Storage: *Electronic and paper-based.*

The Data Controller stores the reservation and personal data of Tourists both on paper and electronically, while financial data of Tourists are stored exclusively in electronic form, in closed systems used during operations. The agents of Hajnalka Sándor e.v. shall handle data processing with the utmost care: the company shall takee all necessary and reasonable measures to secure storage of electronic data, while the secure handling of data is guaranteed by employee confidentiality agreements.

- Data Processing Principles:

- *Purpose Limitation Principle:*

One pillar of lawful data processing is that processing without a purpose is unlawful. Data are continuously examined to ensure their content is accurate. Personal data are only processed to the extent necessary to achieve the purpose. The data processing must be suitable for achieving the

purpose; if the defined purpose is not achieved, processing must be terminated. The purpose of data processing carried out by Hajnalka Sándor e.v. is defined by legal requirements and contractual relationships. This purpose is never deviated from. We always ensure that data are only processed until the purpose is achieved, with no further actions performed on it.

- *Data Minimization Principle:*

Hajnalka Sándor e.v. shall always process data necessary and suitable for achieving the purpose. The company continuously monitors data containing personal information to ensure that only data corresponding to reality are retained and processed to the extent necessary to achieve the purpose.

- *Accuracy Principle:*

It follows from the above principle that data must always be up-to-date. The Data Controller must continuously examine the data inventory, correct inaccurate or incorrect data, and if correction is not feasible, erase them. Employees of the Data Controller always verify the accuracy of data in their data controller capacity, correcting inaccurate or incorrect data without undue delay or erasing them if correction is not feasible.

- *Storage Limitation Principle:*

After the specified purpose is achieved, the data will be erased or anonymized.

- Tourist's Rights Related to Data Processing:

- *They may withdraw their consent to data processing at any time;*
- *They may request feedback on whether their personal data are being processed, and if so, access to the personal data and the information in this Notice;*
- *They may request the Data Controller to:*

◊ *Correct their personal data,*

◊ *rase, restrict, or block the processing of their personal data;*

- *object to the processing of their personal data;*
- *request the restriction of data processing;*
- *transfer their data to another controller;*

The data subject can request information about their personal data, modifications, erasure, and the enforcement of other rights from the Data Controller in person, by mail, by phone, or by email.

The Data Controller will provide the requested information in an understandable form within the shortest possible time, but no later than 15 days from the date of the submission of the request, in writing, upon the data subject's request. Should the data subject's request prove to be justified, the Data Controller shall promptly take measures to correct or erase the personal data.

If the Data Controller records personal data that is inaccurate, the Data Controller shall amend it if the accurate personal data is available.

The Data Controller shall erase personal data if:

- *its processing is unlawful;*
- *it is incomplete or incorrect, and this condition cannot be legally remedied;*
- *upon the request of the data subject;*
- *the purpose of data processing has ceased, or the legal storage period of the data has expired;*
- *it is ordered by a court or authority;*

Personal data that are subject to erasure will be blocked instead of being erased if requested by the data subject or if, on the basis of the information available, it is to be assumed that erasure would harm the legitimate interests of the data subject. Personal data blocked in such way may only be processed for as long as there is a processing purpose that precludes the erasure of the personal data.

The Data Controller may transfer data among the lawfully processed data to:

- *authorities entitled by law to resolve legal disputes,*
- *authorities with jurisdiction for the protection of national security, defense, and public safety, and the prosecution of public criminal offenses,*
- *other authorities in accordance with legal provisions.*

Should the data subject disagrees with the decision or information provided by Data Controller on processing of their personal data, or should the Data Controller fails to meet the statutory response deadline, the data subject may turn to a court or the Hungarian National Authority for Data Protection and Freedom of Information within 30 days from the communication of the decision or from failure to meet the deadline. The Regional Courts has jurisdiction over such cases. If the Regional Courts uphold the request, the Data Controller may be required to provide information, correct, block, delete the data, annul the automated decision, consider the data subject's right to object, or issue the data.

Should the data subject's rights be infringed or if he/she wishes to make a complaint, he/she may contact the following contact details or the following authorities::

- *Competent Court*
- *Hungarian National Authority for Data Protection and Freedom of Information: H-1530 Budapest, Szilágyi Erzsébet fasor 22/C*
- *Hajnalka Sándor e.v. (sole proprietor): H-3529 Miskolc, Középszer u. 6. 7/2.*

Data Management Related to Website Operation

- ***Website Operator:***
    - *Name:- CWeb Hosting Kft.*
    - *Headquarters:* Cg.01-09-405273
    - *Mailing Address:* support@cweb.hu
    - *Phone Number:* +36307539671

- ***Data Management Principles During Website Operation:*** *Personal data can be processed if:*

  a) The data subject consents, or

  b) It is ordered by law or – based on legal authorization, within the specified scope – a local government decree for public interest purposes (mandatory data processing). Personal data can also be processed if obtaining the data subject's consent is impossible or involves disproportionate costs, and the processing is necessary for the fulfillment of a legal obligation of the Data Controller or for the enforcement of the legitimate interests of the Data Controller or a third party, provided that such interest justifies the restriction of the right to personal data protection. If the personal data is collected with the consent of the data subject, the Data Controller can process the collected data without further consent for the fulfillment of a legal obligation or for the enforcement of legitimate interests, provided that such interest justifies the restriction of the right to personal data protection, even after the consent is withdrawn. Personal data can be transferred to a data controller or data processor in a third country if the data subject has explicitly consented, or if the above conditions are met, and the adequate level of protection of the transferred data is ensured during processing. Transfers to EEA countries are considered as domestic transfers within Hungary.

- ***Scope of Processed Personal Data and Characteristics of Data Processing:***

  The data processing activities of the website https://hunseoulmate.com..... are based on voluntary consent. Regarding the data of the website visitors:

  - ***Purpose of Data Processing:*** *During the visit of the website, the hosting provider of the website records the visitor's data in order to monitor the functioning of the service and to prevent abuse.**Legal Basis for Data Processing:*** *The consent of the data subject and Section 13/A (3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.*
  - ***Scope of Processed Data:*** *Date, time, IP address of the user's computer, the URL of the visited page, the URL of the previously visited page, data related to the user's operating system, and browser.*
  - ***Duration of Data Processing:*** *365 days from the date of the visit fo the website.*

- ***Use of Google Analytics:***

  This website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses "cookies," which are text files placed on one's computer to help the website analyze how users use the site.

  The information generated by the cookies about the use of the website by the visitor is usually transmitted to and stored by Google on servers in the United States. By activating IP anonymization on this website, Google will shorten the IP address within member states of the European Union or other parties to the Agreement on the European Economic Area before transmitting it. Only in exceptional cases will the full IP address be sent to and shortened by

Google servers in the USA. On behalf of the website operator, Google will use this information to evaluate your use of the website, compile reports on website activity, and provide other services related to website and internet use to the website operator. The IP address transmitted by your browser within the scope of Google Analytics will not be merged with other data from Google. You can prevent the storage of cookies by adjusting your browser settings accordingly, but please note that doing so may prevent you from using all features of this website fully. Google Analytics' web analytics software and external servers help to independently measure and audit the website's visitor traffic and other web analytics data. Detailed information about the handling of measurement data by the data controller can be found at www.google-analytics.com.

External service providers place and read back small data packages, known as cookies, on the user's computer to provide a customized service. If the browser sends back a previously saved cookie, the service providers can link the current visit of the user with previous ones but only regarding their own content.

- ***Cookie Management:***

According to Section 20 (1) of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information, the following shall be specified regarding the cookie management of the website:

1. ***Fact of Data Collection and Scope of Processed Data:*** *Unique identifier, dates, times.*
2. ***Scope of Affected Individuals:*** *All individuals visiting the website.*
3. ***Purpose of Data Collection:*** *Identifying users, creating statistics, recording "request for quote/bookings," and tracking visitors.*
4. ***Duration of Data Processing and Deadline for Data Deletion:*** *The last viewed page: deleted after 10 years, PHP session ID: deleted when the browser is closed.*
5. ***Persons Authorized to Access Data and Manage Data:*** *Hajnalka Sándor sole proprietor and her assignees, respecting the above principles.*
6. ***Description of Data Subjects' Rights Related to Data Management:*** *Data subjects can delete cookies in the browser's Tools/Settings menu, typically under Privacy settings.*

- ***Legal Basis for Data Processing:***

No consent is required from the data subject if the exclusive purpose of using cookies is to carry out the transmission of a communication over an electronic communications network, or if the service provider needs them to provide an information society service explicitly requested by the subscriber or user. Typical cookies on websites include "cookies used for password-protected sessions," "shopping cart cookies," and "security cookies," which do not require prior consent from the data subjects.

- ***Data Transfer:***

Based on a written contractual authorization, personal data may be transferred to a third country in three scenarios:

1. *If the data subject has explicitly consented to the data transfer,*
2. *In the absence of explicit consent, if the following conjunctive conditions are met:*
    - *a. The Data Controller subject to the Act CXII of 2011. has a recognized legal basis for data processing, and*
    - *b. The third country ensures an adequate level of protection for personal data as determined by a binding legal act of the European Union, or an international agreement provides adequate guarantees.*
3. *Exceptional data transfer based on Section 6 (2) of the Act CXII of 2011., in which case it is not necessary to examine whether the third country ensures an adequate level of protection for personal data.*

The conditions for international data transfer in the Act CXII of 2011. are based on Articles 25-26 of the Data Protection Directive.

- ***Consent Must Be Voluntary:***

Consent is not considered to be valid if the data subject has not been given the opportunity to make a genuine choice or has been presented with a fait accompli. Consent must be explicit, meaning it can only be a valid legal basis for data transfer if given specifically for a certain transfer or category of transfers. Consent must be informed: the information provided to the data subject must include the risks of transferring their data to a country that does not ensure adequate protection for their personal data.

- ***Contacting via the Website:***

    - ***Purpose of Data Processing:*** *Contacting, maintaining contact, providing information, requesting information.*
    - ***Legal Basis for Data Processing:*** *The consent of the data subjectt.*
    - ***Scope of Processed Data:*** *Name, email address, phone number, date, and time, as well as other personal data provided by the data subject.*
    - ***Deadline for Data Erasure:*** *The duration of data processing depends on the specific user goal, but data will be erased immediately if the originally intended purpose has been achieved or if the data subject requests its erase.*

- ***Initiation of Personal Data Deletion or Modification:***

    - *By mail: Hajnalka Sándor sole proprietor, H-3529 Miskolc, Középszer u. 6. 7/2.*
    - *By email: sandor.hajnalka.tourguide@gmail.com*
    - *By phone: +36304036505*

~~*KÖZÖSSÉGI OLDALAK (FACEBOOK, INSTAGRAM...stb. lesznek?)*~~

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Relevant legal regulations, especially but not exclusively:

- *Act CXII of 2011 on informational self-determination and freedom of information;*
- *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.*

This Privacy Notice is available, accessible, and can be reviewed on the Service Provider's website and at the Service Provider's registered seat/premises. By using the service, the Tourist declares that they have understood and accepted the contents of this notice. The Tourist consents to the Data Controller processing their personal data to the extent necessary for the performance of tasks related to the Contract concluded with the Data Controller, and also consents to the Controller sending to the Tourist, using the contact details provided by the Tourist in the Contract, notifications concerning the Tourist's person related to the tasks necessary for the performance of the Contract.

This Privacy Notice forms an integral part of the Contract and the General Terms and Conditions.

Miskolc, July 1, 2024.

Sándor Hajnalka e.v.

<u>Interpretative provisions:</u>

GDPR [General Data Protection Regulation]

Data Subject: [GDPR Article 4] Any natural person identified or identifiable based on any information. Identifiers may include name, date of birth, location data, online identifier, phone number, etc. Information Act Section 3(1): Any specific information relating to an identified or – directly or indirectly – identifiable natural person based on personal data.

Personal Data: [GDPR Article 4] Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. Information Act Section 3(2): Data that can be associated with the data subject, conclusions drawn from the data concerning the data subject. Especially the name of the data subject, identifier, as well as any knowledge specific to one or more of the physical, physiological, mental, economic, cultural, or social identity of the data subject, and conclusions drawn from the data concerning the data subject. Personal data retains its quality during data management until the relationship with the data subject can be restored!

Sensitive Data: [GDPR Article 9] Certain data within the scope of personal data is subject to stricter rules. Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or

sexual orientation. Personal data concerning criminal convictions and offences are also considered special categories of personal data, and children's personal data is under enhanced protection. Information Act Section 3(3)-(4): Personal data concerning racial or ethnic origin, political opinions or, religious or other beliefs, trade union membership, health, abnormal passion, and personal data on criminal acts.

Data Controller: [GDPR Article 4] A natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. Information Act Section 3(9): A natural or legal person or an organization without legal personality who independently or jointly with others determines the purpose of data processing, makes decisions on data processing (including the tools used), and implements it or executes it with a data processor.

Data Processing: [GDPR Article 26] Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction. If two or more controllers jointly determine the purposes and means of processing, they shall be considered joint controllers. The distribution of their responsibilities related to their tasks is clearly determined in a transparent manner in the agreement concluded between them. The agreement must clearly define the joint controllers' roles and their relationship with data subjects. Information Act Section 3(10): Any operation performed on the data, regardless of the applied procedure or the tools and devices used for the operation, including but not limited to collection, recording, registration, organization, storage, alteration, use, inquiry, transmission, publication, alignment, or combination, restriction, deletion, and destruction of data, as well as preventing further use of the data, capturing photos, sounds or images, and recording physical features suitable for identifying the person. (e.g., fingerprint, DNA sample, iris image).

Data Processor: [GDPR Articles 4 and 26] A natural or legal person, public authority, agency, or any other body which processes personal data on behalf of the controller. The data processor does not have independent authority or decision-making power over the data! Information Act Section 3(18): A natural or legal person or an organization without legal personality who, based on a contract – including a contract concluded under a legal provision – carries out data processing.

Data Processing: Information Act Section 3(17): Performing technical tasks related to data processing, regardless of the method and tools used for the execution of operations and the location of the application, provided that the technical task is performed on the data. It is important to emphasize that if the data processor deviates from the task specified in the written contract during data processing, they switch to the role of data controller! The rights and obligations of data processors concerning the processing of personal data are determined by Sándor Hajnalka e.v., i.e., the data controller. Sándor Hajnalka e.v. is responsible for the legality of the instructions for data processing operations, but according to the GDPR provisions, the data processor is also responsible.

Recipient: [GDPR Article 4] The recipient is a natural or legal person, public authority, agency, or any other body to whom/which personal data are disclosed, regardless of whether they are a third

party. In practice, recipients are considered to be those to whom/which personal data of natural persons are transferred, i.e., those/which receive the data for any purpose.

Data Transmission: Information Act Section 3(11) Making data accessible to a specific third party.

Public Data of Interest: Information or knowledge recorded in any way or form, independent of the method of processing, individual or collective nature, not falling under the concept of personal data, managed by a body or person performing state or local government tasks and other public duties defined by law or arising in connection with the performance of public duties, including evaluation extending to the competence, jurisdiction, organizational structure, professional activities, its effectiveness, the types of data held, the laws regulating its operation, and financial management, the contracts concluded, the data concerning. It is necessary to ensure that anyone can access public data held by Sándor Hajnalka e.v., except when the data has been declared a state or service secret by the authorized body under a law, the organization's leader classifies it as a business secret, or if it is a data classified under an international treaty obligation. Business Secret: Any fact, information, solution, or data related to economic activities, the disclosure, acquisition by unauthorized persons, or use of which would harm or jeopardize the rightful financial, economic, or market interests of the owner – not including the Hungarian state – and for which the rightful owner has taken the necessary measures to keep it confidential.

Legal Basis for Data Processing: [GDPR Article 6] The legal basis for data processing: User consent, Section 5(1) of the Information Act, and Section 13/A(3) of Act CVIII of 2001 on electronic commerce services and services related to the information society (hereinafter referred to as Elker tv.): The service provider may process personal data necessary for the provision of the service only if this is essential for the provision of the service and for the fulfillment of other purposes defined in this Act, but even in this case, only to the extent and for the duration necessary.