



Local government of Szendrő
3752 Szendrő, 1. Hősök tere
titkarsag@szendro.hu



Privacy notice and information on the processing of personal data

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I. General regulations

I.1. The data processor

Name of the data processor:	Local Government of Szendrő (Szendrő Városi Önkormányzat)
Registered offices and address:	3752 Szendrő, 1. Hősök tere
Central phone number:	+36 48 560 506
Fax:	+36 48 560 508
E-mail:	titkarsag@szendro.hu
Web:	www.szendro.hu

I.2. The aim of the guidance

The aim of the guidance is to present the privacy policy of the Local Government of Szendrő through different business processes and to show those expectations which were articulated by them for themselves about the operation of the „**vegrevar.hu**” webpage and how they obey it.

I.3. Relevant legislations

The principles of the data processing are in line with the current legislations of Hungary in connection of data protection and the connecting regulations of the European Union:

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act")
- with the international agreements in connection with the data protecting and legal sources of the European Union (especially the regulation 2016/679 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation))

These laws and acts are taken into consideration as well:

- Act LXVI of 1995. on Public Records, Public Archives, and the Protection of Private Archives
- Act CL of 2017 on the Rules of Taxation,
- Act C of 2000 on Accounting
- Decree No. 114/2007. (XII.29.) GKM rules of digital archiving

- Act CVIII of 2001 on certain issues of electronic commerce activities and information society services
- Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity
- Act CXXXIII of 2005 on the rules of private security and private investigation

I.3.1. Concepts in connection with the data processing:

This guidance uses the interpretative provisions of the Act CXII of 2011 on Informational Self-Determination and Freedom of Information for technical terms of the data processing.

The privacy policy of the Data processor has consideration for the General Data Protection Regulation with the point that this regulation must be revised after the Regulation come into force. The expressions used in the guidance must be interpreted according to the concepts determined in the Act CXII of 2011 on Informational Self-Determination and Freedom of Information. If you have any questions, or any of the concepts could not be understood please turn to our data protection contact person.

- **data subject** means a natural person who can be identify according to their determined, identified personal data directly or indirectly. In case of advertisements these are the persons who takes the advertisement out. In real estate deals the data subjects are the persons who are in the deal and those whose right or vested interest is concerned by the deal.
- **personal data:** means any data relating to the data subject – especially the name, identification number of the data subject, and one or more data about the physical, physiological, mental, economic, cultural, or social identity – and the inference for the data subject which can be drawn from the data
- **consent:** means any freely given, specific, informed, and unambiguous indication of the data subject's wishes, by which he, by a statement or a clear affirmative action, signifies agreement to the processing of personal data relating to him in full scale or just partly;
- **protest:** the statement of the data subject in which they object to their data processing and asking for the finish of their data processing or the deleting of the processed data
- **controller:** means the natural or legal person, or organisation having no legal personality, which, alone or jointly with others, determines the purposes of data processing, makes decisions concerning data processing (including the means used) and implements such decisions or has them implemented by a processor;
- **processing:** means any operation or set of operations that is performed on data, regardless of the procedure applied; in particular, collecting, recording, registering, organising, storing, modifying, using, retrieving, transferring, disclosing, synchronising or connecting, blocking, erasing and destroying the data, as well as preventing their further use; taking photos and making audio or visual recordings, as well as registering physical characteristics suitable for;
- **technical processing:** fulfilling the technical tasks in connection with the data processing independently from the method or tools used for the fulfilling of the operations, and from the place of the application if the technical task is done with the data

- **processor** means a natural or legal person, or an organisation not having legal personality which or who processes personal data according to contract including the contract made on the basis of the regulations of the act,
- **data forwarding:** making the data available for a determined third person (that is forwarding the data),
- **disclosure:** means making the data accessible to anyone, for example: representing on the internet;
- **data erasure:** means making the data unrecognisable in such a way that its restoration is no longer possible;
- **data marking:** marking the data with identification sign with the aim of differentiation;
- **data blocking:** marking the data with identification sign to block its processing finally or for a determined period
- **dataset:** means all data processed in a single registry;
- **third party:** means a natural or legal person, or an organisation having no legal personality, other than the data subject, controller, processor and the persons;
- **personal data breach:** unlawful processing of the personal data, especially unjustified access, alteration, forwarding, publication, erasing or cancelling and accidental cancelling or damaging
- **biometric data:** means personal data resulting from specific technical processing relating to the physical, physiological, or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data,;
- **data concerning health:** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his health status,
- **enterprise:** natural or legal persons doing economic activity independently from its legal form including partnerships and associations
- **group of enterprises:** (Data processor) the controlling enterprise and the enterprises checked by it

II. Privacy policies

The Data processor provides service for natural persons in the first place. The Data processor is committed in protecting the personal data of the partners having contact with, and highly consider to be important to respect the information self-determination right of the visitors and the employees. In consequence of this our company fulfil our obligation to process the data in connection with its activities suit to the determined expectations according to the current legislations. The Data processor tries to minimize the processing of the personal data and processes only the data which is necessary for the different transactions.

The taking down and processing of the data is based on laws or voluntary approval of the data subject and needed for the contracts in connection with the ordered services.



The data received by the Data processor is not published and not forwarded to a third person. The claim of an authority or court or forwarding the data based on a regulation of a law is exception.

The privacy policies and rules in connection with the data processing are available continuously on the webpage.

II.1. Rules of the data processing

II.1.2. The Act CXII of 2011 on Informational Self-Determination and Freedom of Information 20. § (1) stipulates that processing personal data can be done only for the purpose of law practicing or fulfilling obligation. The personal data processed by the data processor must not be used for personal interest or for different purpose from the rules determined in the regulation. The data processing should suit the principle of data processing limited to the intended purpose and based on this the Data processor process personal data only for determined aim, for the purpose of law practicing or fulfilling obligation and with a minimum degree and time which is needed for achieving the aim.

II.1.3. The data processing must serves the purpose in every period of it – and if the purpose of the data processing ended, or the processing of the data is unlawful, the data is erased. The Data processor processes the data with the previous approval of the data subject or according to the law or legal authorization. The Data processor inform the data subject about the purpose of the data processing and the legal ground of the data processing, the circle of the data concerned and the keeping time.

II.1.4. The employees who fulfil the data processing at the organizations of the Data processor and the employees of the organizations who work on behalf of the Data processor and attend the data process or fulfil any part of the process must keep the personal data as a secret. The persons who process the personal data and have an access possibility must state a Non-disclosure agreement.

II.1.5. If the person fall within the regulation finds out about that the personal data processed by the Data processor is incorrect, incomplete or not up to date shall correct it or ask for correction from the employee responsible for the data recording.

II.1.6. The obligations of the privacy policies concerning the natural or legal persons or organisations without legal entity doing the data processing on behalf of the Data processor shall be enforced in the service contract with the data processor. Personal data can be transferred to a third country data processor controlling or processing data if the data subject has given explicit consent, the conditions of processing in the foregoing fulfilled, the adequate level of protection of the personal data transferred is provided by the controller or processor engaged in processing in the third country. The transfer to the EEA States shall be considered as a data transfer within Hungary.

II.1.7. The data processing in connection with the activity of the Data processor based on voluntary approval. However, in certain cases, the processing, store and transferring of a circle of the given data shall be done because of the laws.

II.1.8. The actual manager of the Data processor's main organisation determines the inner organisation of the data protection, the line of duties and responsibilities concerning the data protection and activities, and assigns the person controlling the data processing taking the operating characteristics of the Data processor into consideration.

II.1.9. The colleagues of the Data processor shall arrange that unauthorized persons cannot see the personal data furthermore the personal data shall be stored and placed in a kind of way that unauthorized person cannot reach, get to know, change or destroy. The control of the inner data protection of the Data processor is provided by the manager by appointing or charging a person responsible for the data protection.

II.1.11. Other data processing

About those data processing which are not listed in this guidance information is given during the data taking down. At the same time, we inform our customers that the court, the attorney, the investigation authority, offence authority, the administrative authority, the National Authority for Data Protection and Freedom of Information and based on the regulations other authorities can contact the Data processor to provide information, data, documents, and transfer data for them. The Data processor provides personal data to a kind of extent which is necessarily needed for fulfilling the purpose of the request for the authorities not mentioned taxonomically above – if the authority specified the exact purpose and the circles of the data.

II.2. Data processing

II.2.1. Inquiry of the target group by phone

The purpose of the data processing: Information about the sights, programmes, and possibilities in connection with the Végrevár touristic project.

The legal ground of the data processing: The voluntary approval of the data subjects for the data processing of their data.

The calls arriving to the Data processor do not recorded.

The circle of data subjects: Tourists who enquire about the possibilities in connection with the Végrevár touristic project.

The circle of the processed data: The name, email address, phone number of the data subject.

The source of the processed data: It is provided by the data subject voluntarily.



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Place of the data processing: The office of the data processor (3752 Szendrő, 1 Hősök tere.)

The form of the data processing: on paper, or a digital note made by the given administrator on the workstation used by them.

The deadline of the data processing: maximum 1 year or until the data subject does not withdraw their approval, protest against the process of their data or ask for the erasure of their data.

The deadline of the store of the data: it is the same as the deadline of the data processing, and in case of digital notes and security savings of it, according to the Decree No. 114/2007. (XII.29.) GKM rules of digital archiving it is 10 years.

The Data processor handle the personal data getting during the telephone conversation confidentially, but the data subjects have the responsibility for the factual content and the lawfulness of the information.

II.2.2. Inquiry of the target group by email

The purpose of the data processing: Information about the sights, programmes, and possibilities in connection with the Végrevár touristic project.

The legal ground of the data processing: The voluntary approval of the data subjects for the data processing of their data.

The circle of data subjects: Tourists who enquire about the possibilities in connection with the Végrevár touristic project.

The circle of the processed data: The name, email address, phone number of the data subject.

The source of the processed data: It is provided by the data subject voluntarily.

Data processing: The data processor uses a data processor for the electronic correspondence.

Data processor: The name of the company providing the correspondence: Parisat Kft.

3700 Kazincbarcika, 54 Építők útja.

Email: parisat@parisat.hu

Place of the data processing:

The email-service server operated by the Data processor, the place of the server: Parisat Kft. 3700 Kazincbarcika, 54 Építők útja

- The workstation of the administrator keeping contact with the data subject in the office of the Data processor (3752 Szendrő, 1 Hősök tere.)

The form of the data processing: EML form in the file system of the mail server, eml form in the mail server of the workstation of the administration keeping contact with the customer.

The deadline of the data processing: maximum 1 year or until the data subject does not withdraw their approval, protest against the process of their data or ask for the erasure of their data.

The deadline of the store of the data

- Until the data subjects ask the erasure of their data
- The storing time of the backup containing the correspondence is 10 years according to the Decree No. 114/2007. (XII.29.) GKM rules of digital archiving

The Data processor handle the personal data getting during the correspondence confidentially, but the data subjects have the responsibility for the factual content and the lawfulness of the information.

II.2.3. Maintaining contacts with the partners by phone

The purpose of the data processing: Keeping contact with the operators of the sights of the Végrevár touristic project in those cases if the operator does not work for the Data processor.

The legal ground of the data processing: Contractual and the voluntary approval of the data subjects for the data processing of their data.

The calls arriving to the Data processor do not recorded.

The circle of data subjects: The employees specified as a contact person at the partner or the partners themselves.

The circle of the processed data: The name, email address, phone number of the data subject.

The source of the processed data: It is provided by the data subject voluntarily.

Place of the data processing: Common Local Government of Putnok

The form of the data processing: on paper, or a digital note made by the given administrator on the workstation used by them.

The deadline of the data processing: maximum 1 year or until the data subject does not withdraw their approval, protest against the process of their data or ask for the erasure of their data.

The deadline of the store of the data: it is the same as the deadline of the data processing, and in case of digital notes and security savings of it, according to the Decree No. 114/2007. (XII.29.) GKM rules of digital archiving it is 10 years.

The Data processor handle the personal data getting during the telephone conversation confidentially, but the data subjects have the responsibility for the factual content and the lawfulness of the information.



II.2.4. Maintaining contacts with the partners by email

The purpose of the data processing: Keeping contact with the operators of the sights of the Végrevár touristic project in those cases if the operator does not work for the Data processor.

The legal ground of the data processing: Contractual and the voluntary approval of the data subjects for the data processing of their data.

The circle of data subjects: The employees specified as a contact person at the partner or the partners themselves.

The circle of the processed data: The name, email address, phone number of the data subject.

The source of the processed data: It is provided by the data subject voluntarily.

Data processing: The data processor uses a data processor for the electronic correspondence.

Data processor: The name of the company providing the correspondence: Parisat Kft.

3700 Kazincbarcika, 54 Építők útja.

Place of the data processing: The email-service server operated by the Data processor, the place of the server: Parisat Kft. 3700 Kazincbarcika, 54 Építők útja

- The workstation of the administrator keeping contact with the data subject in the office of the Data processor (3752 Szendrő, 1 Hősök tere.)

The form of the data processing: EML form in the file system of the mail server, eml form in the mail server of the workstation of the administration keeping contact with the customer.

The deadline of the data processing: maximum 1 year or until the data subject does not withdraw their approval, protest against the process of their data or ask for the erasure of their data.

The deadline of the store of the data

- Until the data subjects ask the erasure of their data
- The storing time of the backup containing the correspondence is 10 years according to the Decree No. 114/2007. (XII.29.) GKM rules of digital archiving

The Data processor handle the personal data getting during the correspondence confidentially, but the data subjects have the responsibility for the factual content and the lawfulness of the information.



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II.2.5. The operation of the A „vegrevar.hu” webpage

The purpose of the data processing: Keeping contact, introduction of the sights of the Végrevár touristic project.

The legal ground of the data processing: The voluntary approval of the data subjects for the data processing of their data.

The circle of data subjects: Basically, personal data is not represented on the webpage, but we reserve the possibility to mention the contact person or any of the partners on it.

The circle of the processed data: The name, email address, phone number of the data subject.

The source of the processed data: It is provided by the data subject voluntarily.

Data processing: The “vegrevar.hu” webpage operates on the server of the Dexef Kft, and the Dexef Kft, provides storage space for the webpage.

Place of the data processing: The server operated by the Data processor.

The form of the data processing: The database supporting the operation of the webpage.

The deadline of the data processing: it is the same as the operation of the Végrevár project or until the data subject does not withdraw their approval, protest against the process of their data or ask for the erasure of their data.

The deadline of the store of the data

- Until the data subjects ask the erasure of their data
- The storing time of the backup containing the correspondence is 10 years according to the Decree No. 114/2007. (XII.29.) GKM rules of digital archiving

II.2.6. Use of cookies

Certain elements (usually advertisements) of our webpage the www.vegrevar.hu send so called “cookies” (small size data file) to the User’s computer. The “cookies” can store the personal stings of the User (login name, password, settings etc.) and the time of the visit. If the User does not want to receive these files these can be banned here: Internet browser/Tools/Internet settings/Data protection. Attention! The total ban of the “cookies” can result in the not proper operation of certain webpages and functions!

III. Technical background

III.1. Data security

The security of the personal data is ensured with physical and technical security by the Data processor according to their technical level, which prevent the unauthorized availability to the data, the unauthorized change or transfer, the intentional or random erasure or destroy. However, if a data security incident occurs the Data processor undertakes to inform the data subject. Besides, the Data processor takes the actions needed to avoid the further damages and to lessen to the minimum the measure of the damage caused by the data security incident. The physical, logical, and administrative regulations in connection with the data security are in the Regulations of the Data Security of the Data processor.

III.2. Data portability

At the data subject request the Data processor can provide the data of the data subject and the data which can be claimed by the data subject by certification in a portable and processable way.

IV. Legal practice, legal remedy

IV.1. The right of the data subject in connection with the data processing

- can ask for information about the circle of the processed personal data, the purpose of the processing, the source of the data and any important circumstances of the data processing determined in the Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act")
- can ask for correcting their personal data, and erasing or blocking their personal data-except the compulsory data process
- can protest against the data process

The data subject can practice the rights mentioned above by a statement sent to the postal address of the Data processor or the titkarsag@szendro.hu email address.

IV.2. The circle of persons entitled to get to know the data

During the time of the data processing the personal/official data of the Data subject can be got to known at the Data processor by the manager of the main organisation of the Data processor, the manager of the given member of the Data processor, the personally contributing members of the Data processor's activity or those employees or representatives who need the access to this data for fulfilling their duties.

IV.3. Possibilities for legal remedy

The data subject can get onto the court in any case of damage in connection with the processing of their data. The judgement of the lawsuit is within the law court competence. The data subject may bring the action before the regional court having territorial jurisdiction over his domicile or place of residence, according to their choice. The data subject is eligible for initiate the legal action of the National Authority for Data Protection and Freedom of



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Information if a damage occurred during the data processing of their personal data or if there is a direct chance of it. Contacts of the authority: postal address: 1530 Budapest, Pf.: 5., phone number: +36 (1) 391-1400, e-mail address: ugyfelszolgalat@naih.hu, web page: <http://naih.hu>

V. Condition of the data processor

The data processor reserves the right to change its data security statement if it is needed. It can happen, if the circle of the services is extending, the technical system changes or it shall be done by a regulation. However, this kind of change shall not be mean the processing of the personal data differently from the original purpose.