

## **Controller**

Controller means the 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.

Taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, the controller shall implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with Regulation (EU) 2016/679 of the European Parliament and the Council (hereinafter: Regulation).

### **Details of the Controller:**

- Company name: Busch-Hungária Kft.
- Address: 9027 Győr, Martin utca 1.
- Tax number: 14063093-2-08
- Telephone: +36 30 287 1547
- E-mail: [ugyvezetes@busch-hungaria.hu](mailto:ugyvezetes@busch-hungaria.hu)

## **1. Purpose of the data protection notice**

The purpose of this data protection notice is to provide clear, concise, and comprehensible information about the processing of personal data on the website to natural persons and representatives of legal persons (hereinafter: Visitors) who visit the <https://www.busch-hungaria.hu/> website operated by the Controller and to ensure that Visitors are able to exercise their rights.

## **2. Data protection officer**

The Controller shall designate a data protection officer in any case where the core activities of the Controller or the Processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale.

Details of the data protection officer:

- Name: Gábor László
- Telephone: 06 30 546 42 21
- E-mail: [laszlo.gabor@klpszolgaltato.hu](mailto:laszlo.gabor@klpszolgaltato.hu)

### 3. Processor

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Where processing is to be carried out on behalf of a controller, the controller shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of this Regulation and ensure the protection of the rights of the data subject.

Processing by a processor shall be governed by a contract or other legal act under Union or Member State law, that is binding on the processor with regard to the controller and that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the controller. That contract or other legal act shall stipulate, in particular, that the processor processes the personal data only on documented instructions from the controller.

The Processor, as operator of the website of the Controller:

- Name: MediaCenter Hungary Kft.
- Address: 6000 Kecskemét, Erkel Ferenc utca 5.
- Tax number: 13922546-2-03
- Company registration number: 03 09 114492
- Telephone: +36 21 201 0505
- E-mail: [mediacenter@mediacenter.hu](mailto:mediacenter@mediacenter.hu)

### 4. Legal background

- Regulation (EU) 2016/679 of the European Parliament and the Council 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: Regulation)
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Privacy Act)

### 5. Definitions

**‘personal data’** means 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.

**‘processing’**: means 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,

organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**‘restriction of processing’** means the marking of stored personal data with the aim of limiting their processing in the future.

**‘pseudonymisation’** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**‘filing system’** means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

**‘recipient’** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**‘third party’** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**‘consent’** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**‘personal data breach’** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**‘enterprise’** means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;

**‘supervisory authority’** means an independent public authority duly established by a Member State. (Hungarian National Authority for Data Protection and Freedom of Information)

## **6. Principles of the processing of personal data**

Lawfulness, fairness and transparency:

- personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject,

Purpose limitation:

- personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,

Data minimisation:

- personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,

Accuracy:

- processing shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay,

Storage limitation:

- personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed,

Integrity and confidentiality

- personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Accountability

- The controller shall be responsible for, and be able to demonstrate compliance with items a) to f)

## **7. Scope of the data protection and data security notice**

The scope of this data protection notice covers visitors to the <https://www.busch-hungaria.hu/> website, the personal data of users browsing or using a service on the website, as well as processing connected with the activity of the Controller, and promoting the right of accessing and disseminating data.

## **8. Purpose of data processing on the website and scope of data processed**

The Controller shall process data with the consent of the natural person data subject, to meet legal obligations it is subject to, and to perform tasks under the exercise of public powers vested in it:

- for ad-hoc queries, the contact details of the data subject (name, e-mail address, mailing address, telephone number), to the extent and for the duration required for providing the information or service,
- data, image, and actions recorded on video of natural persons attending events organised by the Controller.
- personal data to be provided on job application forms:
  - ✓ for blue-collar positions:  
surname, first name, date of birth, highest academic qualification, other qualifications, telephone number, CV.
  - ✓ for white-collar positions:  
surname, first name, date of birth, telephone number, e-mail address, CV.

## **9. Lawfulness of processing**

Processing shall be lawful only if and to the extent that at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6(1)a) of the Regulation)
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)b) of the Regulation)
- processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6(1)c) of the Regulation)

## **10. Storage period**

Personal data shall be stored for the shortest period possible. Personal data may only be processed if the purpose of processing cannot be reasonably achieved through other means. To ensure that personal data are only stored for the necessary period, the Controller shall establish deadlines for their erasure or regular review.

Natural person data subjects may withdraw their previous consent to the processing of their personal data at any time. Withdrawal of consent shall not affect the lawfulness of processing based on the consent prior to its withdrawal.

Personal data provided for job applications may be stored for a maximum of one year.

## **11. Data security**

Access to the website is granted with personalised rights. Access rights may only be granted to persons who are not subject to a restriction for security or other reasons (e.g. conflict of interest) and possess the professional and information security knowledge required for safe use.

The IT equipment on which data is stored is protected against external attacks by multi-level, active, and complex antivirus protection with firewalls.

Web hosting provider (hereinafter: Service Provider):

- Name: MediaCenter Hungary Kft.
- Registered seat: 6000 Kecskemét, Erkel Ferenc utca 5.
- Telephone: +36 21 201 0505
- E-mail: [mediacenter@mediacenter.hu](mailto:mediacenter@mediacenter.hu)

The Service Provider shall take reasonable care to protect the data stored by the Controller on the servers of the Service Provider. The Service Provider shall ensure the technical security of the processing of personal data by the Controller and shall implement technical measures to prevent unauthorised access to personal data.

The Service Provider undertakes to store its database in a system that requires unique identification of users and ensures that only entitled persons can access data in it.

The Service Provider shall choose and operate the IT equipment used for processing personal data during the service so as to ensure that processed data is protected against unauthorised access.

When determining and applying data security measures, the Service Provider shall consider the state of the art and shall implement technical and organisational measures to protect the security of processing that provide an appropriate level of protection against risks connected with processing.

During processing, the Service Provider shall protect information, ensuring that only entitled persons can access it, shall safeguard the accuracy and completeness of the information and the processing method, and shall ensure that entitled users can access the requested information and that the means for this are available when needed.

## **12. Cookie principles**

Cookie files:

Cookies are small data files placed by the browser on the computer or device of the visitor. Among others, cookies collect information, remember the individual settings of the visitor, and generally simplify the use of the website for visitors. Cookies themselves do not collect data stored on the computer or in files.

Types of cookie files:

- session cookie: these cookies are activated temporarily, for the duration of browsing, that is, from the moment the user opens the browser until they close it. As soon as the browser closes, all session cookies are deleted.
- persistent cookie: these cookies remain on the device of the user for the period specified in the cookie and are activated each time the user visits the website.
- own cookie: these cookies are created by the website visited by the user at a certain time. (e.g., in this case, [www.hu.weber](http://www.hu.weber))
- third-party cookie: when the user visits a site, a third party activates the cookie through the website.

## Use of cookie files

### Necessary cookie:

These cookies provide help while browsing the website and remember operations performed on certain pages. Without these cookies, the services would not work; however, they do not store data about the user that would indicate other websites they visited.

### Necessary cookie files:

- remember contact information entered
- remember products ordered, services, and other fields to be completed after the user leaves the website
- remember the user if they visit the website again

These cookies must be accepted for the correct use of our website; if the user turns them off, we are unable to guarantee the correct functioning of our website, nor appropriate security during its use.

### Performance cookie files:

These files collect information about the activity of the user on the website. These cookies do not collect information based on which the user could be identified, but they are important for improving the operation of the website and assessing its efficiency based on the interest shown by visitors.

### Purposes of using performance cookie files:

- web analytics: provides statistics about the use of our website
- fault management: helps develop the website by measuring faults that occur
- testing designs: for testing versions of our website with different designs

By using the website you accept the use of performance cookies. These cookies must be accepted for the correct use of our website; if the user turns them off, we are unable to guarantee the correct functioning of our website, nor appropriate security during its use.

### Functional cookies files:

These cookies are used to provide various services and to remember the settings of the user, thereby facilitating visiting and browsing the website.

Importance of consent to the use of cookie files:

By using the website you consent to our placing cookie files on your computer, in order to be able to analyse the use of the website. If you reject cookies while browsing on this page, our website may not function fully.

Deleting and turning off cookies:

Cookies serve to simplify the use and processes of the website. If users block or delete cookies, they may be unable to use the functions of the website fully and it may operate differently in their browser than planned.

You can find more information on cookies on the following websites:

- <http://www.youronlinechoices.com/hu/>
- <http://www.allaboutcookies.org/>
- <http://cookiepedia.co.uk/cookie-laws-across-europe>

Google Analytics Cookies

- <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
- <http://www.google.com/intl/en/policies/privacy/>

### **13. Exercising rights connected with processing**

Right to information:

Data subjects have the right to clear information about the processing of their data and about their options for exercising their rights as data subjects. Data subjects have the right to access the data collected about them and to exercise this right simply and with reasonable frequency, in order to determine and verify the lawfulness of processing.

Right to access:

Data subjects have the right to information from the Controller as controller, as to whether their personal data are being processed, and to access their personal data and the following information:

Right to lodge a complaint addressed to the supervisory authority:

- if the data were collected not from the data subject, then information about their source,
- the fact of possible automated decision-making, with information on the logic applied, as well as information on the expected consequences of processing for the data subject.

Right to rectification:

Data subjects have the right to request rectification of their incorrect personal data by the Controller without undue delay. Taking the purpose of processing into account, data subjects



have the right to request the addition of missing personal data, by means of a supplementary declaration, among others.

#### Right to erasure:

Data subjects have the right to request erasure of their personal data by the Controller without undue delay, provided that other conditions are fulfilled. The right to erasure does not apply to processing required under legislation or internal regulations. In certain cases the Controller is legally obliged to process certain data, in which case erasure of such data cannot be requested. This applies, in particular, to personal data processed in order to comply with a legal processing obligation to which the Controller is subject, data processed on grounds of public interest or to perform a task under the exercise of public powers vested in the Controller.

#### Right to restrict processing:

Data subjects have the right to request restricted processing by the Controller if one of the following conditions is fulfilled:

- the data subject contests the accuracy of personal data – in this case the restriction applies for the period that allows the Controller to check the accuracy of personal data,
- processing is unlawful, and the data subject objects to the erasure of data, requesting their restricted processing instead,
- the Controller no longer needs the personal data for processing, but the data subject requires them in order to submit, enforce, or defend legal claims.

If the data subject objects to the processing, the restriction applies until it is determined whether the legitimate reasons of the Controller take precedence over the legitimate reasons of the data subject.

#### Right to data portability:

Data subjects have the right to request that the Controller transfer their personal data processed automatically pursuant to performing the contract or based on consent, to them or another Controller nominated by them. The right to data portability cannot be applied if processing is performed on grounds of public interest, to perform a task under the exercise of public powers vested in the Controller, or if the controller is exercising public powers or is complying with a legal obligation.

#### Right to object:

Data subjects have the right to object to the processing of their personal data, for any reason connected with their own situation. In this case, the Controller may not process their personal data any further, except if processing is justified by compelling and legitimate reasons that take precedence over the interests, rights, and freedoms of the data subject or are connected with submitting, enforcing, or defending legal claims.

#### Automated decision-making:

The Controller does not use automated decision-making.

## 14. Legal remedy

If the natural person data subject believes that their rights connected with the processing of their personal data have been infringed, they may turn to the data protection officers of the Controller for information and exercising their rights.

Lodging a complaint with the supervisory authority:

Without prejudice to other administrative or judicial remedy options, every data subject has the right to lodge a complaint with the supervisory authority if they believe that the processing of their personal data violates this Regulation.

- Name: Nemzeti Adatvédelmi és Információszabadság Hatóság
- Registered seat: 1055 Budapest, Falk Miksa utca 9-11.
- Mailing address: 1363 Budapest, Pf.: 9.
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- Telephone: + 36 1 391-1400

The data protection notice may only be created and amended by the Controller, or by the data protection officer, under a mandate. If the data protection notice is amended, its validity must be specified.

The Controller reserves the right to amend the data protection notice unilaterally. Visitors to the <https://www.busch-hungaria.hu/> website accept the provisions of the data protection notice in force. In addition to the data protection notice, the Controller has also implemented a data protection and security regulation.

Valid: 01.10.2022