

PRIVACY POLICY

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1 Policy Objective

We accept this Policy for the purpose of providing all relevant information to natural persons using our services and to representatives of legal entities (hereinafter referred to as Users) in a concise, transparent, understandable and easily accessible form, in a clear and plain language, and to assist the Users in exercising their rights under section 4. Our services are available on website <https://www.olivia.hu/>

Our obligation to provide information is based on Article 12 of Regulation (EU) No 2016/679 of the European Parliament and of the European Council (hereinafter referred to as the [GDPR](#)), applicable from 25 May 2018, Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: [Privacy Act](#).) and paragraph 4 Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services ([Elkertyv.](#)).

The Policy has been prepared taking into account the GDPR, the Privacy Act and other legislation relevant to certain data processing. The list of legislation is given in Annex 9.1 to the Policy, the most important concepts are given in Annex 9.2 and the individual rights of the data subject are described in detail in Annex 9.3.

During development and application of present Policy, we acted in accordance with findings contained in the recommendation of National Authority for Data Protection and Freedom of Information on data protection requirements of prior information, and taking into account Article 5 of GDPR, in particular in the spirit of the principle of accountability in Article 5 (2).

We also monitor the European Union's practice with regard to the protection of personal data; accordingly, we are also incorporating the content of the European Commission's Working Group 29 [Guidelines](#) on Transparency into our data management practices.

2 Data controller's data

Company name:	„OLIVIA” Kft
Address:	6050 Lajosmizse, Mizse 94.
Name and position of legal representative:	Meinrad Alois Odermatt, CEO
Business registration No.:	03-09-100566
VAT-No.:	10545980-2-03
Telephone number: [*]	
E-mail: [*]	

3 Data processing procedures

In this section, we detail the essential circumstances of each data processing that are required of all data controllers by the GDPR and other sectoral legislation.

3.1 Making and maintaining contacts

You can contact us through our website for any purpose. In addition, we process the personal data of the contacts of our business partners in the course of our work. The details of the related data processing are shown below.

3.1.1 Personal data controlled by data controller and the purpose of data processing

personal data	purpose of data processing	legal basis of data processing
name	Identification of the user or contact person of our business partner	user's consent (Article 6 (1) (a) of the GDPR Legitimate interest in the case of a business partner (Art. 6 (1) (f) GDPR)
e-mail	contacting and maintaining contact with the user or contact person of our business partner	user's consent (Article 6 (1) (a) of the GDPR Legitimate interest in the case of a business partner (Art. 6 (1) (f) GDPR)
telephone number	contacting and maintaining contact with the User or contact person of our business partner	user's consent (Article 6 (1) (a) of the GDPR Legitimate interest in the case of a business partner (Art. 6 (1) (f) GDPR)

3.1.2 Legal basis of data processing

The User's consent to the processing of his or her personal data for the purposes set out in section 3.2.1, given by performing a voluntary, explicit conduct (phone call, sending e-mail) at the time of contact (Article 6 (1) (a) of the GDPR).

If we use the User's data for a purpose other than the original purpose of data collection, we will inform the User of this and obtain his/her prior, express consent or provide him or her with the opportunity to prohibit such use (see section 9.1).

We process the above personal data of contact person of our business partners on the basis of the legitimate interests of the data controller and our business partners (Article 6 (1) (f) GDPR). It is in the legitimate interest of both parties to ensure that business communication is carried out effectively during the use of the website and during partner consultations and that we are able to provide information to each other's appointed representatives about any material circumstances affecting the contract concluded between us. The right of informational self-determination of the contact person of our business partner cannot be violated because he or she has a job or contractual obligation to facilitate communication between the parties and to provide his or her personal data for this purpose. The contact person of our business partner may object to this processing.

3.1.3 Data management duration

The personal data provided will be processed until the withdrawal of consent. The User may withdraw his/her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

We process the personal data of the contact persons of our business partners for as long as it is necessary for purposes of communication and for as long as the relevant legal provisions allow it (5 years from the performance or termination of the contract under Act V of 2013, 8 years from the issuance of the invoice under Act C of 2000).

3.1.4 Data management modality

Data management takes place in an electronical form.

4 What are the user's rights?

It is important to us that our data processing complies with the requirements of fairness, lawfulness and transparency. In view of this, in this section we briefly describe the individual rights of the data subject and then explain them in more detail in Annex 3 of this Policy.

Our user may request free information about the details of the processing of his or her personal data, access them or receive a copy of the personal data processed, and may request their rectification, erasure, blocking or restriction of processing in cases specified by law and may object to the processing of such personal data. Requests for information and requests in this section can be addressed to our contact details in section 2.

4.1 Right of access

Our user may receive feedback from us on the processing of his or her personal data and have access to these personal data or details of their processing and may receive a copy of the personal data we process.

4.2 Right to rectification

At the request of the user, we will rectify inaccurate personal data concerning him or her without undue delay or have the right to request that incomplete personal data be completed, including by means of a supplementary statement.

4.3 Right to erasure

At the request of the user, we will delete the personal data concerning him or her if we do not need to process them, or if he/she withdraws his/her consent or objects to the processing or their processing is unlawful.

4.4 Right to be forgotten

If requested, we will endeavor to notify any data controller who has become aware of or may have become aware of the User's data that may have been disclosed.

4.5 Right to limitation of data management

At the request of the User, we restrict the data processing if the accuracy of the personal data is disputed or the data processing is unlawful, or the User objects to the data processing, or if we no longer need the personal data provided.

4.6 Right to data portability

The user may receive the personal data concerning him or her, which he or she has provided, in a structured, commonly used and machine-readable format, or forward them to another data controller.

4.7 Right to object

The User has the right to object the processing of his or her personal data for reasons of his or her own situation and based on legitimate interest (see section 3.1). In this case, we will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the User or for the establishment, exercise or defense of legal claims. In the event of an objection, personal data may no longer be processed for this purpose as a general rule.

4.8 *Reply to requests*

We will examine the application as soon as possible, but not later than 30 days – 15 days in case of objections – and we will make a decision on its merits, of which we will inform the applicant in writing. If we do not comply with the User's request, we will state in our decision the factual and legal reasons for rejecting the request.

4.9 *Proceedings for legal remedy*

It is important to us to protect personal data, and at the same time we respect the user's right to informational self-determination, so we try to respond to all requests in a correct manner and within the deadline. In view of this, we kindly ask users to contact us – in order to make a complaint or question – in order to resolve any objections as soon as possible before resorting to any official or judicial claim.

If the request fails, the User

1. the User can enforce his or her rights in court based on the Act V of 2013 on the Civil Code, (the lawsuit can also be initiated before the court competent for the place of residence or residence of the User; the list and contact details of the tribunals can be viewed via the following link: <http://birosag.hu/torvenyszekek>), and
2. as set out in the Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Privacy Act)., you can contact the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu; website: <https://naih.hu/>; hereinafter referred to as NAIH).

5 Proceedings with regard to request to exercise rights

5.1 Notice to recipients

We will notify the recipients to whom we have disclosed the User's personal data of rectification, erasure or restriction of data processing in all cases, unless this proves impossible or involves a disproportionate effort. At the User's request, we will provide information about these recipients.

5.2 Notification procedure, time limit for notification

We will provide information in electronic form on the action taken in response to requests related to clause 4 within a maximum time of one month from the receipt of the request, unless otherwise requested by the User. That time limit may, if necessary, be extended by a further two months, taking into account the complexity of the application and the number of applications. We will inform the User of the extension of the deadline within one month of receipt of the request, indicating the reasons for the request.

At the request of the User, oral information may also be provided, provided that he/she verifies his/her identity by other means.

If we do not take action on the request, we will inform the User of the reasons for this within a maximum time of one month from the receipt of the request, as well as the possibility to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) and to exercise his or her right to a judicial remedy (section 4.9).

5.3 Control

In exceptional circumstances, if we have reasonable doubts about the identity of the natural person making the request, we will ask you to provide additional information necessary to confirm his or her identity. This measure is necessary for the purpose of promoting the confidentiality of data processing as defined in Article 5(1)(f) of the GDPR, i.e., to prevent unauthorized access to personal data.

5.4 Cost for notification and taking measures

Information provided and the measures taken on the basis of requests related to point 4 will be provided free of charge.

If the User's request is clearly unfounded or excessive, in particular due to its repetitive nature, we will charge a reasonable fee or refuse to act on the request, taking into account the administrative costs of providing the requested information or communication or taking the requested action.

6 Data security

Taking into account the current state of science and technology and the costs of implementation, as well as the nature, scope, context and purposes of data processing, as well as the risk of varying likelihood and severity to the rights and freedoms of natural persons, we implement appropriate technical and organizational measures, such as pseudonymisation, on one hand aimed at implementing data protection principles such as effective implementation of data minimization, and on the other hand, incorporating necessary safeguards into data processing in order to meet the requirements of the GDPR and protect the rights of data subjects.

Our employees and the employees of data processors are entitled to access the User's personal data to the extent necessary for the performance of the tasks related to their job. We take all security, technical and organizational measures that guarantee the data security.

6.1 *Organizational measures*

We allow access to our IT systems with a personally identifiable entitlement. The allocation of access is subject to the principle of "necessary and sufficient rights", i.e. our IT systems and services may be used by all employees only to the extent necessary for the performance of their tasks, with corresponding privileges and for the period necessary. Access rights to IT systems and services should only be granted to persons who are not restricted for security or other reasons (e.g. conflicts of interest) and who have the professional, business and information security knowledge necessary to use them safely.

We and the data processors undertake strict confidentiality rules in a written statement and are obliged to act in accordance with these confidentiality rules in the course of our activities.

6.2 *Technical measures*

The data – with the exception of the data stored by our data processors – is stored on our own devices in a data center. IT devices storing the data are stored in a separate server room, protected by a multi-stage access control system subject to authorization control.

We protect our internal network with multi-level, firewall protection. At the entry points of public networks in use, a hardware firewall (border protection device) is always located everywhere. The data is stored redundantly – i.e., in several places – to protect it from destruction, loss, damage, unlawful destruction due to the failure of an IT device.

We protect our internal networks from external attacks with multi-level, active, complex malware protection (e.g., antivirus). We implement essential external access to IT systems and databases operated by us via an encrypted data connection (VPN).

We do our best to ensure that our IT tools and software continuously comply with the technological solutions generally accepted in market operation.

In the course of our developments, we develop systems in which it is possible to control and track the actions performed through logging, and to detect incidents that have occurred, such as unauthorized access.

Our server is located on a separate dedicated server of the hosting provider, protected and closed.

Taking into account the relevant [recommendation](#) of the National Authority for Data Protection and Freedom of Information (NAIH), we use the HTTPS protocol on the website, which means a higher level of data security compared *to the HTTP protocol*.

7 Cookies

In order that our website can function properly, in some cases we place small data files on the User's computer device, as is the case with most modern websites.

7.1 What is a cookie?

A cookie is a small text file that the website places on the User's computer device (including mobile phones). Thanks to this, the website can "remember" the User's settings (e.g., language, font size, display used, etc.), so that it does not have to be reconfigured every time he or she visits our Website.

These cookies can be deleted or blocked, but in this case the website may not function properly.

We do not use cookies to identify the User personally. These cookies are only used for the purposes described above.

7.2 How cookies can be managed?

Cookie files can be deleted (detailed information: www.AllAboutCookies.org) or blocked with most of today's browsers. However, in this case, when using our site, certain settings must be made again each time and certain services may not work.

Detailed information on deleting and blocking cookies can be found on the www.AllAboutCookies.org (English) page and on the browser used by the user at the following links:

- [Google Chrome](#)
- [Bing](#)
- [Firefox](#)

8 Other provisions

8.1 Data processing for different purposes

If we intend to use the data provided for a purpose other than the one for which the data was originally collected, we will inform the Users thereof and obtain their prior, express consent or provide them with the opportunity to prohibit the use.

8.2 Obligation to provide record

We keep records of the processing activities carried out under our responsibility (records of processing activities) in accordance with Art. 30 GDPR.

8.3 Privacy incident

Privacy incident is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, processed personal data. In the event of privacy incident, we are obliged to act in accordance with Art. 33 and 34 GDPR. We keep a record of privacy incidents, indicating the facts related to privacy incident, its effects and the measures taken to remedy the situation.

8.4 Modification

We are entitled to unilaterally amend this Policy at any time. If the Policy is amended, we will keep its versions according to the previous time state and, if possible and justified, we will draw the attention of the data subjects to the amended provisions.

enters into force: May 20. 2022.

„OLIVIA” Kft.

Data Controller

9 Annexes

Annex 9.1 Relevant legislation

While establishing the Policy, the Data Controller took into account the relevant legislation in force and the most important international recommendations, in particular the following:

1. 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 (GDPR);
2. Act No. CXII of 2011 on informational self-determination and freedom of information, Act CXII of 2011 (Privacy Act);
3. Act No. V of 2013 on the Civil Code (Civil Code);
4. Act No. CXXX of 2016 on the Code of Civil Procedure (Pp);
5. Act No. C of 2000 on Accounting (Act on Accounting);
6. Act No CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Elkertv.)

Annex 9.2 Definitions related to personal data management

- data controller: the legal entity that determines the purposes and means of personal data processing;
- data 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- data transfer: making the data available to a specific third party;
- data erasure: making data unrecognizable in such a way that it is no longer possible to recover it;
- data identification: the affixing of an identification mark to the data in order to distinguish it;
- restriction of data processing: marking stored personal data with the aim of limiting their processing in the future;
- data destruction: the complete physical destruction of the data carrier containing the data;
- data processor: a legal entity that processes personal data on behalf of the controller;
- recipient: a natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether a third party or not;
- cookie: a small data packet (text file) sent by the web server and placed on the user's computer for a specified period of time, which, depending on its signal, can be supplemented by the server on subsequent visits, i.e., if the browser returns a previously saved cookie, the service provider managing the cookie has the possibility to link the user's current visit with previous ones, but only with regard to its own content;
- data subject/user: an identified or identifiable natural person; an identifiable natural person is a person 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;
- third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor or persons who, under the direct authority of the controller or processor, are authorized to process personal data;

- consent of the person concerned: any freely given, specific and clearly expressed statement of the will from the person concerned, based on appropriate information by which the person concerned indicates by a declaration or an act unequivocally expressing confirmation that he or she gives his or her consent to process his or her personal data.
- IP address: server machines have an IP address, i.e., an identification number in all networks, where communication is carried out according to the TCP/IP protocol, which allows the identification of the respective machines on the network. It is known that every computer connected to a network has an IP address through which it can be identified.
- personal data: any information relating to the data subject.;
- objection: a statement made by the person concerned objecting to the processing of his or her personal data and requesting the termination of the data processing or the deletion of the processed data.

Annex 9.3 Rights affected by the Policy

Access

The User has the right to receive access to the personal data processed by us upon request – submitted via one of our contact details. Within this framework, the User will be informed about the following:

1. whether the User's personal data is being processed;
2. purposes of personal data processing;
3. categories of personal data concerned;
4. recipients or categories of recipients to whom the personal data have been or will be disclosed;
5. planned duration for personal data storage;
6. the User's rights;
7. legal remedies;
8. information on data sources.

The User may also request that a copy of his/her personal data, which is subject to data processing, will be provided to him / her. In this case, the personal data will be provided in a structured, commonly used, machine-readable format (PDF/XML) or in its printed version on paper. Requesting a copy is free of charge.

Rectification

The User has the right – upon a request submitted through our contact details – to request the rectification of inaccurate personal data processed by us concerning him or her and the completion of incomplete data. If we do not have the information necessary to clarify or supplement the incorrect information, we may request the submission of this additional data and the verification of the data's accuracy. As long as the clarification or completion of the data cannot be carried out – in the absence of additional information – we will restrict the processing of the personal data concerned, the operations performed on them – with the exception of storage – will be temporarily suspended.

Deletion

The User has the right – upon a request submitted via our contact details – to request the deletion of the personal data processed by us concerning him or her if one of the following conditions is met:

1. we no longer need the data in question;
2. the User is concerned about the lawfulness of data processing performed by us.

If we determine - following the User's request - that there is an obligation to delete the personal data processed by us, we will terminate the personal data processing and destroy the previously processed personal data. In addition, the obligation to delete personal data may exist on the basis of the withdrawal of consent, the exercise of the right to object, as well as legal obligations.

Restriction of data processing

On the basis of a request submitted through our contact details, the User has the right to request the restriction of personal data processing processed by us concerning him or her in the following cases:

- the User is concerned about the lawfulness of personal data processing concerning him or her and asks for the restriction instead of deleting the data;
- we no longer need the data in question, but the User requires them for the establishment, exercise or defense of legal claims.

We automatically restrict the personal data processing if the User disputes the accuracy of the personal data or if the User exercises his or her right to object. In this case, the restriction applies to the period of time that makes it possible to verify the accuracy of the personal data or, in the event of an objection, to determine whether there are any circumstances to continuation of personal data processing.

During the period of restriction, no data processing operations may be performed on the indicated personal data, but only stored data. Where processing has been restricted, personal data may only be processed in the following cases:

1. on the basis of the data subject's consent;
2. the establishment, exercise or defense of legal claims;
3. protection of the rights of another natural or legal person;
4. important public interest.

Users will be informed in advance of that the restriction had been lifted.

Data portability

The User - subsequent a request submitted through our contact details - has the right to request the provision of personal data processed by us concerning him or her, for further use specified by the User, In addition, the User may request that we transfer his or her personal data to another data controller designated by him/her.

This right is limited to the personal data provided by the User to us and processed for the performance of his/her contract. There is no portability of other data. Personal data is provided to the User in a structured, commonly used, machine-readable format (PDF/XML) or in a printed version of the data on paper.

We inform the User that exercising this right does not automatically result in the deletion of personal data from our systems. In addition, the User has the right to contact or communicate with us again after the data has been transferred.

Objection

The User may at any time object to the processing of his/her personal data for the purposes set out in section 3.1 of this Policy, upon a request submitted through our contact details. In this case, we will examine whether the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the User or which are related to the establishment, exercise or defense of legal claims. Where we determine that such reasons exist, we will continue to process the User's personal data. Otherwise, the personal data will be no longer processed.