

Privacy Notice for the Handling of Clients' Data

Laposa Zsófia Sole Proprietorship
8261 Badacsonytomaj, Római út 197/1.
16 April 2024
Laposa Zsófia Sole Proprietorship

1. GENERAL INFORMATION

Data Controller: Laposa Zsófia Sole Proprietorship (registered office: 8261 Badacsonytomaj, Római út 197/1.). The Data Controller operates the services related to the vineroof.hu and winesofi.hu websites.

Joint Data Controllers:

- None

Data Subject: refers to the Data Controller's potential or actual client, who is interested in the services provided and products sold by the Data Controller. A potential client is a natural person who provides their personal data in response to the Data Controller's offer or request for information. A client is a potential client who contacts the data controller through the website.

Personal Data: any information relating to the Data Subject.

1.1. Purpose of this Privacy Notice: To inform the Data Subjects, with regard to data protection regulations, about the most important circumstances of data processing carried out by the Data Controller.

1.2. Commitment to Data Protection: The Data Controller is committed to protecting the personal data of the Data Subjects and considers it of utmost importance to respect the Data Subjects' right to information self-determination.

1.3. Right to Amend the Notice: The Data Controller reserves the right to amend this Notice, about which it will provide information in accordance with applicable laws.

1.4. Principles of Data Handling:

The Data Controller handles personal data lawfully, fairly, and transparently ("lawfulness, fairness, and transparency");

The Data Controller collects personal data only for specified, explicit, and legitimate purposes, and does not process them in a way that is incompatible with those purposes ("purpose limitation").

Personal data managed are adequate and relevant from the perspective of the purposes of data processing, and their handling is limited to what is necessary ("data minimization").

Personal data managed are accurate and kept up to date ("accuracy").

Personal data are stored in a form that allows identification of data subjects only as long as is necessary for the purposes of processing personal data ("storage limitation").

Personal data are processed in a way that ensures their proper security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures ("integrity and confidentiality").

1.5. Data Processing Principles of the Data Controller: These principles are in accordance with current data protection laws, including:

The Fundamental Law of Hungary (Freedom and Responsibility, Article VI);

Personal data are processed lawfully, fairly, and in a transparent manner towards the data subject ("lawfulness, fairness, and transparency");

Personal data are collected for specified, explicit, and legitimate purposes and not processed in a manner that is incompatible with those purposes ("purpose limitation");

Personal data managed are adequate and relevant from the perspective of the purposes of data processing, and their handling is limited to what is necessary ("data minimization");

Personal data managed are accurate and kept up to date ("accuracy");

Personal data are stored in a form that allows identification of data subjects only as long as is necessary for the purposes of processing personal data ("storage limitation").

The processing of personal data is carried out in a manner that ensures the proper security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures ("integrity and confidentiality").

Legal Framework:

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 (General Data Protection Regulation – "GDPR");

Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Info Act");

Act V of 2013 on the Civil Code ("Civil Code").

1.6. Availability of the Privacy Notice: The Privacy Notice and other information related to the data processing by the Data Controller are available at the registered office of the Data Controller and on the Data Controller's website (hereinafter: Website).

1.7. Contact Information: Should you have any questions regarding this Privacy Notice or the data processing activities of the Data Controller, please contact our colleague at vineroof.badacsony@gmail.com.

2. DATA PROCESSING

2.1. Data Minimization: The Data Controller strives to limit the personal data processing activities it conducts to the necessary minimum, however, the processing of certain personal data is inevitable. The Data Controller processes the personal data provided by the Data Subject, as well as those personal data related to the Data Subject that arise during the contractual relationship between the Data Controller and the Data Subject, following the Data Subject's data request and in connection with the Data Controller's offer. The Data Controller processes the following personal data based on the legal basis and for the purposes indicated:

2.1.1 General Contact Information

Purpose of Data Processing: To manage personal data for the purpose of contacting potential clients. Potential clients may provide their personal data to the Data Controller via phone, email, the website, social media platforms, other digital media channels, or in person to request more information. Additionally, online advertisements and lead collection sites may transfer personal data at the request of the Potential Client, but in such cases, these sites act as independent service providers and data controllers.

Types of Personal Data Managed: Full name, email address, telephone number, written communication between the parties.

Optional Data Provided: Residential address, age, document identification, occupation, and information on how the Data Subject learned about the Data Controller's service.

Legal Basis for Data Processing: Data processing necessary for taking steps at the request of the data subject prior to entering into a contract (GDPR Article 6(1)(b)).

Duration of Data Processing: Contact data is deleted by the Data Controller ten years after the termination of the business relationship between the parties.

2.1.2 Booking and Purchasing Procedure

Purpose of Data Processing: Managing personal data for the purposes of accommodation services and sales transactions with clients. If a Potential Client finds a suitable date for accommodation or a suitable product to purchase among the Data Controller's offers, the booking or purchasing process must be initiated via the website using the contact form, including all necessary data.

Types of Personal Data Managed: Name, email address, telephone number, birth name, residential address, place and date of birth, mother's name, personal identification number, identity card number, tax number, passport number, fax number, bank account details (bank name, account number), citizenship, purchased products, services, and details, communication between the parties.

Legal Basis for Data Processing: Data processing necessary for taking steps at the request of the data subject prior to entering into a contract and for the performance of a contract in which the data subject is a party, following the conclusion of the contract (GDPR Article 6(1)(b)).

Duration of Data Processing: Contact data is deleted by the Data Controller five years after the termination of the business relationship between the parties (general limitation period). Personal data contained in contracts are stored for 20 years, and personal data in related databases are deleted after 5 years (general limitation period).

Data Provision: Necessary for the conclusion of the contract. The client is obliged to provide personal data; otherwise, the contract cannot be formed.

2.1.3 Marketing Inquiries

Purpose of Data Processing: To send future offers to the Data Subject.

Types of Personal Data Managed: Name, email address, telephone number.

Legal Basis for Data Processing: The Data Subject has given consent to the processing of their personal data (GDPR Article 6(1)(a)).

Duration of Data Processing: The Data Controller will process the data until the Data Subject withdraws consent, but for no longer than 10 years.

3. OTHER DATA PROCESSING

3.1. Occasional Data Processing: The Data Controller may occasionally process other personal data not listed in this Privacy Notice. The Data Controller will provide information about these data processing activities at the time of data collection.

3.2. Legal Disclosure: We inform the Data Subjects that the court, prosecutor, investigative authority, misdemeanour authority, administrative authority, the National Authority for Data Protection and Freedom of Information (NAIH), or other bodies authorised by law, may contact the Data Controller for the purpose of providing information, communicating data, transferring data, or making documents available. The Data Controller shall release the requested data within the legal framework to the inquiring authority, provided that the authority has specified the exact purpose and the scope of the data.

4. INFORMATION ON COOKIES USED ON THE WEBSITE

4.1. To analyse the usage of the website and thereby improve its services, the Data Controller places and reads back small data packets, known as cookies, on the Data Subject's computer via their browser. This is necessary because if the Data Subject's browser sends back a previously stored cookie, the service managing the cookie has the opportunity to link the Data Subject's current visit with previous ones, but only with respect to the content of its own website.

4.2. The Data Subject can delete cookies from their computer at any time or disable the use of cookies in their browser. Generally, cookie settings can be managed in the browser's "Tools/Settings" menu under "Privacy" settings, labelled as cookies. More detailed guidance can be found on the following website about secure online communication:

4.3. For more detailed information on individual cookies, visit the European Interactive Digital Advertising Alliance (EDAA) website:

<https://www.youronlinechoices.com/hu/>

Name: _ga (Google Analytics)

Function: Tracking cookie for Google Analytics, monitors the duration of each visit

Data Type: Text

Lifetime: Until the end of the session

5.1.1 Hosting and Other Companies:

Amazon Web Services, Inc. (AWS)

platformOS, Inc.

Trampoline Software SRL (formspark.io)

Sanity AS (sanity.io)

6. HANDLING OF THIRD PARTY PERSONAL DATA

6.1 If the Data Subject provides personal data of third parties, it is the Data Subject's responsibility to ensure that they have obtained the necessary consent or met other legal bases for the data transmission, and to notify the Data Controller of any related changes. Data Subjects must refrain from transferring personal data of third parties, unless the transfer is necessary for the fulfilment of a contract with the Data Controller. The Data Subject is solely responsible for the management of these third parties' personal data.

7. DATA SECURITY

7.1 The Data Controller handles personal data confidentiality and, considering the state of technology, the nature of the personal data, and the risks involved, takes all measures necessary to ensure data security and protect against unauthorised access, alteration, transmission, public disclosure, deletion or destruction of personal data, as well as against accidental destruction, damage, and inaccessibility, whether due to human activity, physical, or environmental impacts. The Data Controller selects and operates IT equipment used during the provision of the Service in such a way that the processed data is accessible to those authorised (availability); its authenticity and validation are assured (data processing authenticity); its immutability is verifiable (data integrity); and it is protected against unauthorised access (data confidentiality).

RIGHTS AND REMEDIES

The Data Subject has the right to:

Access personal data: Upon request, the Data Controller provides information about the scope of personal data processed about the Data Subject, whether handled by the Data Controller or processed on behalf of the Data Controller, if the conditions of GDPR Article 15 are met.

Request correction of personal data: The Data Controller corrects inaccurate or incomplete personal data of the Data Subject if the correct data is available.

Request deletion of personal data (right to be forgotten): The Data Controller deletes all personal data if the conditions of GDPR Article 17 are met.

Restrict processing of personal data: The Data Controller restricts the processing of personal data if the conditions of GDPR Article 18 are met.

Data portability: The Data Subject has the right to receive personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used, and machine-readable format, if the processing is based on consent or a contract and carried out by automated means.

8.2. The Data Controller shall inform the Data Subject of the actions taken in response to a request sent to the contact person specified in section 2.7 without undue delay, but in any case within one month of receipt of the request. This period may be extended by two additional months if necessary, considering the complexity and number of requests. The Data Controller will inform the Data Subject of the reason for the delay within one month of receiving the request. If the Data Subject has submitted the request electronically, the information should be provided electronically by the Data Controller, unless the Data Subject requests otherwise. If the Data Controller does not take action on the Data Subject's request, it must inform the Data Subject of the reasons for not taking action, and the Data Subject's rights to file a complaint with a supervisory authority or to seek judicial remedy, without undue delay and at the latest within one month from the receipt of the request.

8.3. The Data Subject's Right to Remedy:

Right to lodge a complaint with a supervisory authority: Without prejudice to any other administrative or judicial remedy, the Data Subject has the right to lodge a complaint with the supervisory authority (National Authority for Data Protection and Freedom of Information: address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c; Tel: +3613911400, Fax: +3613911410, email: ugyfelszolgalat@naih.hu; website: <https://naih.hu/index.html>), if they believe that the processing of their personal data infringes their rights.

Right to judicial remedy: Without prejudice to any other administrative or non-judicial remedies, including the right to lodge a complaint with a supervisory authority, the Data Subject has the right to a judicial remedy if they believe that the processing of their personal data in a manner that infringes upon their rights under data protection laws. The Data Controller is obligated to compensate for any damage caused to the Data Subject due to unlawful handling of their data or a breach of data security requirements. The Data Controller is exempt from liability if the damage was caused by an inevitable reason outside the scope of data handling. The Data Controller is not obliged to compensate for any damage to the extent that it was caused by the Data Subject's intentional or grossly negligent behavior.