

## Privacy Policy for visitors to the <https://mediacompass.hu> website

### 1. Name of the Data Controller

Name: Media Compass Services Limited Liability Company  
Representative: Anna Péntzes, Éva Szemes managing directors  
Registered seat: HU-1117 Budapest, Október huszonharmadika street 8-10.  
Tax number: 23448065-2-43 (HU23448065)  
E-mail address: [info@mediacompass.hu](mailto:info@mediacompass.hu)  
Phone number: +36 70 644 0232  
Website: <https://mediacompass.hu> (hereinafter: „Website”)  
(hereinafter: „Data Controller”)

### 2. Legislative background

In processing the personal data of its partners, the Data Controller shall comply with the following legislation

- 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; hereinafter: „GDPR”);
- Act CXII of 2011 on the Right of Informational Self-Determination and on the Freedom of Information;
- Act V of 2013 on the Civil Code.

### 3. Data processing

#### 3.1. Scope of data subjects and the processed personal data

- a) **Data Subjects:** natural persons visiting the Data Controller's Website and contacting the Data Controller through the Contact Us section of the Website

#### Scope of the processed personal data, purpose, legal basis and security of data processing

Scope of the processed personal data	Purpose of the data processing	Legal basis of the data processing
Full name E-mail address Telephone number Other personal data provided by the data subject	responding to a request from the data subject	the data subject has given consent to the processing of his or her personal data for one or more specific purposes [Article 6 Subsection (1) Point a) of the GDPR]

- b) **Data Subjects:** natural persons visiting the Data Controller's Website and contacting the Controller using the e-mail address, telephone number or address provided on the Website

#### Scope of the processed personal data, purpose, legal basis and security of data processing

Scope of the processed personal data	Purpose of the data processing	Legal basis of the data processing
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Full name E-mail address Telephone number Other personal data provided by the data subject	responding to a request from the data subject	the data subject has given consent to the processing of his or her personal data for one or more specific purposes [Article 6 Subsection (1) Point a) of the GDPR]
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The data subject may contact the Data Controller by e-mail, telephone or post. However, in the case of any more complex questions requiring a longer explanation or in relation to a specific matter already in progress, the Data Controller recommends that the data subject is contacted in writing.

When contacting the Data Controller, the data subject voluntarily provides his or her personal data, which the Data Controller does not use for any purpose other than contacting the data subject. The data subject may at any time withdraw his or her previously given consent and request the erasure of his or her data processed on this legal basis by contacting the Data Controller at the contact details indicated in point 1. Where the data subject's request relates to a contract between the Data Controller and the data subject, the Data Controller shall process the data subject's data in accordance with the provisions of the Privacy Notice on the processing of personal data of partners.

If the data subject is under 16 years of age, the consent of the legal representative or the subsequent consent of the data subject is required for the contact to be made. The consent of the legal representative is not required for the validity of a statement of consent of a minor data subject over the age of 16.

If the data subject does not provide his or her personal data or does not consent to the processing of his or her personal data, the Data Controller will not be able to contact the data subject and will not be able to respond to the data subject's request.

The Data Controller will not use the personal data provided for purposes other than those set out in Subsections a) and b) above. The Data Controller may not disclose personal data to third parties or public authorities other than the data processor upon the prior express consent of the data subject, unless otherwise provided for by Union or Member State law.

### **3.2. Security of data processing**

The Data Controller stores the data in electronic form. Electronic files are stored by the Data Controller on its central server and in an online, restricted-access storage area, subject to appropriate data security measures. Within the Data Controller's organisation, the personal data will be known to the managing directors and staff involved in responding to the request.

**3.3. Duration of data processing:** the Data Controller processes the personal data from the time the data subject provides them.

The personal data provided by the data subject are stored by the Data Controller from the time of contact until the purpose of contacting the data subject is fulfilled. If, as a result of the contacting, a contract is concluded between the Data Controller and the data subject, the Data Controller shall continue to process the personal data on the basis of the existing contract in accordance with the provisions of the Privacy Policy on the data processing of personal data of partners.

If the data subject withdraws his or her consent, the Data Controller will delete the personal data provided for the purpose of contacting him or her.

### **3.4. Data processor**

The Data Controller uses the following data processor to perform the technical operations related to its data processing:

Name	Registered seat	Data processing task
Microsoft Ireland Operations	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland	Providing e-mail system and cloud service
externIT Kft.	HU-1035 Budapest, Hunor street 30. Building C, Staircase I, 2nd floor, Flat 3.	Providing IT background, administrator tasks

The data subject may request a full list of the data processors used by the Data Controller via the contact details in Section 1 above.

#### 4. Cookies

The Data Controller uses cookies on its Website in order to provide the data subject with the best possible user experience. The information collected by the cookies is stored in the Internet browser used by the data subject when visiting the Website.

On the Website, the Data Controller only uses cookies that are necessary for the basic functioning of the site and do not require the prior consent of the data subject. Cookies necessary for the basic functioning of the Website are responsible for functions on the Website without which it cannot be used as intended. The Data Controller does not use or allow cookies that enable third parties to collect data about the data subject.

Cookies expire immediately after the data subject's visit, at the end of the browsing session.

Most commonly used internet browsers (e.g. Chrome, Firefox, Safari) accept and allow the download and use of cookies by default, but it is up to the user to modify their browser settings to refuse or block them. The Data Controller draws the attention of the data subject to the fact that he or she can delete cookies already stored on the computer by changing the browser settings. For more information on the use of cookies, please refer to the help menu of the individual browsers. The Data Controller hereby informs the data subject that if he or she disables the use of cookies in his or her browser, the Website may not function properly.

The Data Controller informs the data subject that it does not currently process cookies for statistical or marketing purposes on its Website. Should the Data Controller handle such cookies in the future, it will of course supplement this cookie policy accordingly.

Cookie name	Description of the cookies	Purpose of the data processing
wp-wpml_current_language	Technical cookie containing the display language used on the Website	Ensuring the proper functioning of the Website

#### 5. Transfer of data

##### 5.1. Transfer of data made in the context of a legal obligation on the Data Controller

In order to comply with the legal obligations applicable to the Data Controller, the Data Controller may transfer the data subject's personal data to the recipients specified by law. Legal basis for the transfer: to comply with a legal obligation to which the Data Controller is subject [Article 6 Subsection (1) Point c) of the GDPR].

**5.2. Other transfer of data:** in case of a dispute between the Data Controller and the data subject in connection with the data processing specified in this Privacy Policy, the Data Controller may transfer the documents relating to the dispute to its legal representative (law firm) acting in connection with the dispute and, in case of court or administrative proceedings, to the competent court or authority. Legal basis for the transfer: the data processing is necessary for the establishment, exercise or defence of legal claims [Article 9 Subsection (2) Point f) of the GDPR], the legitimate interest of the Data Controller [Article 6 Subsection (1) Point f) of the GDPR].

## *6. Rights of the data subjects*

The Data Controller will use its best endeavours to ensure that the rights of the data subjects in relation to the processing of their personal data, as set out below, are respected.

The Data Controller shall provide the data subject with the opportunity to make a request concerning the exercise of his or her data subject rights by any of the following means, using the contact details indicated in point 1

- in person,
- by post
- by e-mail,
- by telephone.

The Data Controller shall comply with the data subject's request without undue delay, but in any event within 30 days of receipt of the request and shall inform the data subject thereof in a concise, transparent, intelligible, and easily accessible form. The Data Controller shall also decide on the refusal of the request within the same time limit and shall inform the data subject of the fact, the reasons and the remedies available to the data subject in this respect.

The Data Controller shall, as a general rule, comply with the data subject's request by e-mail, but if the data subject expressly requests this by providing his or her postal or telephone contact details, the request shall be dealt with by post or telephone. At the request of the data subject, the Data Controller may provide information by telephone only if the data subject has duly verified his or her identity to the Data Controller.

The Data Controller shall provide the data subject with a copy of his or her personal data free of charge for the first time upon the data subject's request. The Data Controller may charge a reasonable fee, based on administrative costs, for the execution of further requests for the same personal data with the same content.

### **6.1. Right of access by the data subject:**

The data subject shall have the right to request, through the contact details indicated in point 1, information about:

- a) whether the processing of his or her personal data is ongoing by the Data Controller;
- b) the data processing, the names and contact details of the data processors referred to in point 3.4., and the personal data transferred;
- c) the purposes for which the personal data of the data subject are processed and the legal basis for the data processing;
- d) the duration of the data processing;
- e) the recipients or categories of recipients to whom or with which the personal data have been or will be disclosed by the Data Controller, including in particular recipients in third countries or international organisations;
- f) to whom, when, under which law, and to which personal data of the data subject the Data Controller shall grant access;

- g) whether automated decision-making is used and, if so, the data subject's access to its logic and the profiling;
- h) the circumstances and effects of any personal data breach and the measures taken to deal with it.

The Data Controller shall, even in the absence of a request by the data subject, inform the data subject by e-mail of any substantial change in the processing of personal data in relation to the provisions of this Privacy Policy, the circumstances of the personal data breach, its effects and the measures taken to remedy it.

### **6.2. Right to rectification**

At the request of the data subject, the Data Controller shall correct inaccurate personal data relating to the data subject.

The Data Controller shall inform all recipients to whom or with whom the personal data have been disclosed of the rectification, unless this proves impossible or involves a disproportionate effort. The data subject shall, upon request, be informed by the Data Controller of those recipients.

### **6.3. Right to erasure**

At the request of the data subject, the Data Controller shall delete personal data concerning the data subject where one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Data Controller and there is no longer a legal obligation to continue processing the data;
- b) the Data Controller has unlawfully processed the personal data;
- c) the personal data must be erased in order to comply with a legal obligation under Union or Hungarian law applicable to the Data Controller.

The Data Controller shall inform all recipients to whom or with whom the personal data have been disclosed of the erasure, unless this proves impossible or involves a disproportionate effort. The data subject shall, upon request, be informed by the Data Controller of those recipients.

### **6.4. Right to restriction of processing**

At the request of the data subject, the Data Controller shall restrict data processing if one of the following conditions is met:

- a) the data subject contests the accuracy of the personal data - in this case, the restriction applies for the period of time that allows the Data Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful but the data subject opposes the erasure of the data and requests the restriction of their use;
- c) the Data Controller no longer needs the personal data for the purposes of the data processing, but the data subject requests them for the establishment, exercise, or defence of legal claims.

The Data Controller shall inform all recipients to whom or with whom the personal data have been disclosed of the restriction, unless this proves impossible or involves a disproportionate effort. The data subject shall, upon request, be informed by the Data Controller of those recipients.

### **6.5. Right to data portability**

At the request of the data subject, the Data Controller shall make available to the data subject the personal data concerning the data subject which the data subject has provided. The Data Controller

acknowledges that the data subject may transfer these personal data to another data controller without the Data Controller's hindrance.

#### **6.6. Right to object**

The data subject shall not have the right to object to the processing of his or her personal data pursuant to Article 6 Subsection (1) Point (a) of the GDPR.

#### *7. Right to remedy*

If the data subject believes that the Data Controller has violated his or her right to the protection of personal data in the course of data processing, he or she may, in accordance with the applicable legislation, seek remedy from the competent authorities, i.e. he or she may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (address: HU-1055 Budapest, Falk Miksa utca 9-11., Postal address: HU-1363 Budapest Pf. 9.; telephone: +36 (1) 391-1400; fax: +36 (1) 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu); hereinafter: "NAIH") or to the competent court. The Data Controller undertakes to cooperate fully with the court concerned or the NAIH in these proceedings and to provide the court concerned or the NAIH with the data relating to the data processing.

The Data Controller also undertakes to compensate for any damage caused by unlawful processing of the personal data of the data subject or by a breach of data security requirements. In case of violation of the data subject's right to privacy, the data subject may claim damages. The Data Controller shall be exempted from liability if the damage was caused by an unavoidable cause outside the scope of the data processing and if the damage resulted from the intentional or grossly negligent conduct of the data subject or from the infringement of the data subject.

#### *8. Miscellaneous provisions*

The Data Controller undertakes to ensure that any processing of data in relation to its activities complies with the requirements set out in this Privacy Policy, in the Data Controller's Data Protection Policy which sets out the same requirements as this Privacy Policy, and in applicable law.

The Data Controller reserves the right to change this Privacy Policy at any time, provided that any changes are communicated to the data subjects in a verifiable manner after the changes have been made.

Applies from: 22 July 2022.