

DATA HANDLING POLICY

Member

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1. Data Controller

Your personal data are controlled by the following members of the HLBS Group – with shared liability – according to the following Data Handling Policy.

HLBS s.r.o.

seated in Nám. SNP 15, Bratislava 811 01, mestská časť Staré Mesto, Slovak Republic
represented by Diána Bánhidý-Fittler and Péter Gábrriel

HLBS GLOBAL MARKETING LTD.

seated in 35 Rodney Street, Liverpool, England, L1 9EN United Kingdom
represented by Kenny Tsang and Péter Gábrriel

In data handling issues, please contact us at

email: support@hlbs.eu

address: 1134 Budapest, Váci út 19.

(hereinafter referred to as “Data Controller”)

2. Data processing cases

Data	Purpose of processing	Duration of storing data	Legal basis
A. Registration data	Creating a Member profile	Until the profile is deleted	Data required for fulfilling the contract. Providing the data is a requirement of membership.
B. HLBS points for calculating commissions	Calculating and paying commissions, and meeting accounting regulations	8 years	Fulfilling the contract by calculating and paying commissions / Storing the data to meet tax and accounting ¹ regulations. Providing the data is a requirement of payment.
C. Purchase data	Fulfilling the contract	Until the contract is fulfilled (The fact of the purchase is stored for 8 years – See Section E)	Data required for fulfilling the contract. Providing the data is a requirement for a successful purchase.

¹ Based on Act C of 2000 on accounting Section 169 (2): “The accounting documents underlying the accounting records directly or indirectly (including ledger accounts, analytical records and registers) shall be retained for minimum eight years, shall be legible and retrievable by means of the code of reference indicated in the accounting records.”

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D. Customer service Personal data provided with inquiries (name, email, personal phone number/address)	Addressing inquiries and handling complaints	5 years	Consent given by sending the inquiry. The consent can be withdrawn any time via email. Withdrawing consent does not affect the legality of handling the data prior to the withdrawal.
E. Data on the invoices issued (name and address of customer)	Fulfilling a legal requirement	8 years	Data storage is required by ² tax and accounting regulations. Providing the data is required for completing the delivery.
F. Facebook, Instagram, Youtube followers (profile data)	Updates on the latest news	Until the follower unsubscribes	Consent given by subscribing. Consent can be withdrawn any time by unsubscribing. Withdrawing consent does not affect the legality of handling the data prior to the withdrawal.
G. Email address	Sending member information	Until the membership is terminated	Data required for fulfilling the contract. Providing the data is a requirement of membership.
H. Data provided for travelling	Organizing trips in full	1 year after the trip	Data required for fulfilling the contract. Providing the data is a requirement for participating on the trip.

3. Data processing and other data handling entities

3.1. Data processing

- ✓ Web hosting is provided by root S.A. (seated in 3, op der Poukewiss, 7795 Roost, Luxembourg) and DATASOURCE AG (seated in Bösch 69 CH-6331, Hünenberg);
- ✓ General administrative duties are fulfilled by HLBS s.r.o. Hungarian Branch (seated in 2161 Csomád, Kossuth Lajos út 79.);
- ✓ Delivery administration is provided by HLBS Admin Kft. and HLBS Products Global Kft. (both seated in 1036 Budapest, Lajos utca 48. Stairway B Floor 4);
- ✓ IT tasks are performed by GPA Investment Group (seated in 1036 Budapest, Lajos utca 48. Stairway B Floor 4);
- ✓ Member emails are sent by the system of WebDream Hungary IT (seated in 1037 Budapest, Testvérhegyi lejtő 10.);
- ✓ Invoices and commissions are accessed by WTS Klient Accounting (seated in 1143 Budapest, Stefánia út 101-103.).

² Based on Act C of 2000 on accounting Section 169 (2): "The accounting documents underlying the accounting records directly or indirectly (including ledger accounts, analytical records and registers) shall be retained for minimum eight years, shall be legible and retrievable by means of the code of reference indicated in the accounting records."

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3.2. Other data controllers

- ✓ Social media companies handle data separately. Their policies are available at the following sites:

Site	Data controller	Data handling policy
Facebook	Facebook Ireland Ltd. (seated in	https://www.facebook.com/privacy/explanation
Instagram	4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland)	https://www.facebook.com/help/instagram/155833707900388/
Youtube	Google Ireland Ltd. ("Google") (seated in Gordon House, Barrow Street, Dublin 4, Ireland)	https://policies.google.com/technologies/product-privacy?hl=hu

- ✓ **For payment, you are redirected to the following data controllers.** These data controllers receive information on the amount payable and a randomly generated purchase ID.

Name	Data controller	Data handling policy
Global Payments	Global Payments Europe s.r.o. Hungarian Branch (seated in 1117 Budapest, Október huszonharmadika utca 8-10. Floor 4 415.)	https://www.globalpaymentsinc.com/en-sk/gdpr
PayPal	PayPal (Europe) S.à.r.l. et Cie, S.C.A. (seated in 22-24 Boulevard Royal L-2449, Luxembourg).	https://www.paypal.com/hu/webapps/mpp/ua/privacy-full

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✓ **Products are delivered** by the following data controllers:

Name	Data controller	Data handling policy
DHL	Deutsche Post AG (seated in Charles-de-Gaulle-Straße 20 53113 Bonn)	https://www.logistics.dhl/hu-hu/home/elolab/helyi-adatvedelmi-nyilatkozat.html
GLS	GLS General Logistics Systems Hungary Kft. (seated in 2351 Alsónémedi, GLS Európa utca 2.)	https://gls-group.eu/HU/hu/adatvedelmi-szabalyzat
PickPackPont /Sprinter	SPRINTER Messenger Company (seated in 1097 Budapest, Táblás utca 39.)	http://www.sprinter.hu/wp-content/uploads/2018/05/Sprinter-Adatkezelesi-Tajekoztato.pdf

✓ Travelling is organized by the following data controllers:

Name	Data controller	Data handling policy
Vista	Vista Travel Agencies (seated in 1061 Budapest, Andrásy út 1.)	https://vista.hu/dokumentumok/adatvedelem/adatvedelmi_tajekoztato_vista_v1-4.pdf

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3. Your rights

Your rights regarding your data are specified in 3.1 to 3.7. If you wish to apply one of these rights, please contact us (see contact details in Section 1).

Identifying

Before we fulfil your request, we must always identify you. If we fail to confirm your identity, unfortunately, your request cannot be fulfilled.

Addressing requests

After confirming your identity, we provide information regarding your request in writing, electronically, or – if you wish – verbally. Please note that if you submit your request electronically, we will also respond electronically. Of course, you can request a different channel for the response in this case as well.

Administrative deadline

We will inform you about the actions taken regarding your request within a maximum of 1 month as from receiving it. Depending on the complexity and the number of the requests, this deadline can be extended by 2 more months which we will inform you about within the 1-month administrative deadline. We are also obligated to inform you within the 1-month administrative deadline if no action is taken. You can file a complaint against this with the National Authority for Data Protection and Freedom of Information (see 4.1) and seek a court decision (4.2).

Administrative fees

The requested information and action is free of charge. An exception is when the request is obviously unfounded or exaggerated – especially due to its repetitive nature. In these cases, we can charge a fee or refuse fulfilling the request.

3.1. You can withdraw your consent (*as described above in Section 2, data handling cases D and F*)

If the data handling depends on your consent, you can withdraw it any time. Please note that withdrawal does not affect the legality of data handling that you previously consented to.

3.2. You can request access to information (*in all cases*)

You can request information about whether your personal data are being handled and if so:

- ✓ With what purpose?
- ✓ What data exactly?
- ✓ Who are we transferring these data to?
- ✓ How long are storing the data for?
- ✓ What rights and legal remedies do you have regarding this?
- ✓ Who did we receive your data from?
- ✓ Have we made automated decisions about you using your personal data? In these cases, you can request information about what logic (method) we are using, what significance such data handling has, and what its potential consequences are.
- ✓ If you have noticed that we have transferred your data to an international organization or a third (non-EU) country, you can request information about what guarantees the proper handling of your personal details.

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- ✓ You can request a copy of your personal data. (For further copies, we may charge an administrative fee.)

3.3. You can request a rectification (*in all cases*)

You can request rectifying or completing your personal data if they are incorrect or incomplete.

3.4. You can request deleting (“forgetting”) your personal data (*Section 2, data handling cases A, C, D, F, G and H*)

You can request deleting your personal data if:

- a) We no longer need your personal data for the purpose we originally used them for;
- b) We only handled your data based on your consent;
- c) It is discovered that we are handling your personal data unlawfully;
- d) It is required by Hungarian or EU law;
- e) Your personal data must be deleted in order to fulfil a legal requirement applied to the Data Controller put forward by EU or Member State law.

We **cannot delete** your personal data if they are required:

- a) for practicing your freedom to express your opinion or your right to information;
- b) for fulfilling a requirement to process personal data under EU or Member State law which the Controller is subject to or it is of public interest;
- c) for the establishment, exercise or defence of legal claims.

3.5. You can request restricting the processing (*in all cases*)

You can request restriction of processing where any of the following conditions is met:

- a) You contest the accuracy of your personal data – in this case, the restriction applies to the period which allows us to overview the accuracy of your personal data;
- b) Data processing is unlawful, but you object to deleting the data, and request restricting them instead;
- c) We no longer need your personal data for data processing, but you need them for the establishment, exercise or defence of legal claims;
- d) You objected to the data processing – in this case, the restriction applies to the period until it is established whether the legal claims of the Data Controller take priority over your legal claims.

Where processing has been restricted, personal data can, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

You will be informed by us before the restriction of processing is lifted.

3.6. You can request receiving your personal data (right to data portability (*Section 2, data handling cases A, C, D, F, G and H*))

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller where the processing is based exclusively on your consent and carried out by automated means.

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4. Legal remedies

4.1. Lodge a complaint with the authorities

If you believe that your personal data are processed in a manner against the regulations of the Data Protection Decree, you have the right to lodge a complaint with a single supervisory authority, in particular in the Member State of your habitual residence – in Hungary, that is the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter referred to as “NAIH”).

NAIH

chair: Dr. Attila Péterfalvi

mailing address: 1530 Budapest, P.O. Box: 5

address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

phone: +36 (1) 391-1400

fax: +36 (1) 391-1410

web: <http://naih.hu>

e-mail: ugyfelszolgalat@naih.hu or privacy@naih.hu

4.2. You can petition a court

If you believe that your personal data are processed in a manner against the regulations of the Data Protection Decree and your rights put forward in the Data Protection Decree have been violated, you have the right to petition a court.

The court proceeding must be pursued at a court with jurisdiction over the Data Controller or data processor's site of activity. Such a court proceeding can also be pursued at a court of your habitual residence.

In Hungary, the merit of the claim is established by the court. You can choose to pursue the court proceeding at a court of your habitual residence. You can be a party to the proceedings without otherwise having legal capacity. The proceedings can be joined by the NAIH to ensure that the claimant wins the case. Besides the Data Protection Decree, the court proceedings are controlled by the articles of Act V of 2013 on the Civil Code Book Two, Chapter 3, Title XII (2:51-2:54) as well as other legal regulations regarding court proceedings.

4.3. Damages and compensation

If the data subject suffers damage from unlawful processing by the Data Controller, the subject should receive full and effective compensation for the damage they have suffered. The Data Controller is not liable for the damages and paying compensation if they can prove that the damage the subject suffered was caused by vis major outside the scope of data processing.

5. Data security

We do everything in our power, considering the current state of science and technology, the cost of implementation, and the nature of the data processing, as well as the risks regarding the rights and freedoms of natural persons, to implement the appropriate technological and organizational measures to guarantee data security that is proportionate to the risk level.

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We always handle personal data privately, with limited access, encryption, maximizing resistance, and – in case of a problem – ensuring restorability. We regularly test our system to guarantee security.

6. Miscellaneous

The Data Controller has the right to modify the content of this Data Handling Policy any time. Any modifications will come to force immediately as posted on the website. Customers will be notified of the changes via pop-up window.

Latest update: 2019. december

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Appendix: Definition of the terms used in this Data Handling Policy

“personal data”: any information relating to a natural person (‘data subject’); 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;

“data subject”: any identifiable natural person who the personal data pertains to (such as the visitor of a website, subscriber to a newsletter, applicant to a job advertisement);

“data controlling”: 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;

“controller”: 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;

“data processing”: performing the technological duties related to data controlling operations;

“processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of (by the instruction and the decision of) the controller;

“third party”: 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”: 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.