

Privacy notice for the Users

The protection of your personal data is of the utmost importance to us, and this Privacy Notice explains what personal data we process about you, for what purposes and on what legal basis. The Privacy Notice also sets out your rights.

1. Data of the Data Controller

Data Controller: RENTBEN Kft. (hereinafter referred to as the "Data Controller")

Headquarters: 1121 Budapest, János Zsigmond utca 11./B.

Company registration number: 01-09-370698

Tax number: 27990681-2-42

Website: www.rentben.com

Email contact: info@rentben.com

2. General legislation on which the processing is based

- 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)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.)
- Act V of 2013 on the Civil Code (Civil Code)
- Act CXXVII of 2007 on Value Added Tax (VAT Act)
- Act C of 2000 on Accounting (Accounting Act)
- Act CLV of 1997 on Consumer Protection (Fgy.tv.)
- Act CXIX of 1995 on the Processing of Name and Address Data for Research and Direct Marketing Purposes (DM Act)
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (Eker tv.)
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising (Act XLVIII of 2008)
- Act I of 1988 on Road Traffic
- Act LXXXVIII of 2014 on Insurance Activities (Bit.)
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services

3. Concepts

Personal Data: 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, 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. Such typical

personal data include in particular: name, address, place and date of birth, mother's name.

Data processing: any operation or set of operations which is performed upon 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, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller: the natural or legal person, public authority, agency or any 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 the processing are determined by Union or Member State law, the Controller or the specific criteria for the designation of the Controller may also be determined by Union or Member State law.

Data Processor: a natural or legal person, public authority, agency or any other body that processes personal data on behalf of the Controller.

Recipient: the natural or legal person, public authority, agency or any other body, whether or not a third party, with whom or to which the personal data are disclosed.

4. Principles

The Data Controller shall take into account the following principles in the processing of personal data, including:

- a. be carried out lawfully and fairly and in a transparent manner for the Data Subject (**lawfulness, fairness and transparency**)
- b. collected only for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes is not considered incompatible with the original purpose in accordance with Article 89(1) of the GDPR (**purpose limitation**)
- c. be adequate, relevant and limited to what is necessary for the purposes for which the data are processed (**data minimisation**)
- d. be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without delay (**accuracy**)
- e. 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; personal data may be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of Data Subjects as provided for in this Regulation (**limited storage**)
- f. be processed in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss,

destruction or damage (**integrity and confidentiality**), by using appropriate technical or organisational measures

- g. the Data Controller is responsible for compliance with the above and must be able to demonstrate such compliance (**accountability**)

5. Data management activities

a.) request a quote by email

Purpose of data processing	Request a quote
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Any natural person
Scope of personal data	Name, email address, phone number
Data retention time	By the end of the 1st year following the request for a proposal
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • mail system provider: Google Ireland Ltd. (based in Google Building Gordon House, Barrow St, Dublin 4, Ireland)
Source of data	The source of personal data is the contracting authority
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to make you an offer.

b.) registration for car sharing application

Purpose of data processing	To use the service, you need to register via a mobile or web application
----------------------------	--

Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Any natural or legal person who is the owner or operator of the vehicle or who holds and registers the licence required to drive the vehicle
Scope of personal data	Email address Registration requires only an email address, no other personal data
Data retention time	Until the end of the 1st year after cancellation of registration
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • mail system provider: Google Ireland Ltd. (based in Google Building Gordon House, Barrow St, Dublin 4, Ireland) • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the registrant
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to provide you with services.

c.) send newsletter

Purpose of data processing	Send newsletter
Legal basis for data processing	Article 6(1)(a) GDPR: consent

Categories of Affected Persons	Any natural person who has registered for the application
Scope of personal data	Name, email address
Data retention period	Until 30 days from the date of withdrawal of consent or unsubscription
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698) • MailerLite Ltd. (Ground Floor, 71 Lower Baggot Street, Dublin, Ireland)
Source of data	The source of personal data is the subscriber to the newsletter
How to provide data, consequences	The provision of data is voluntary. If you do not provide the personal data, the Data Controller will not be able to send you a newsletter.

d.) send push message

Purpose of data processing	Send push messages within the car-sharing application (e.g. modify the GTC, modify the Privacy Policy, system maintenance, send system messages and notifications, etc.)
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking

	steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Service recipient
Scope of personal data	Name
Data retention period	Until the end of the 1st year after cancellation of registration
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	The data must be provided. If you do not provide personal data, the Data Controller will not be able to provide you with information about the service.

e.) use profile picture

Purpose of data processing	Use profile picture within a car sharing app
Legal basis for data processing	Article 6(1)(a) GDPR: consent
Categories of Affected Persons	Service recipient
Scope of personal data	Name, profile picture
Data retention period	Until the end of the 1st year after cancellation of registration

Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	The provision of data is voluntary. If you do not provide personal data, your profile picture will not appear in the application

f.) electronic contracting

Purpose of data processing	Electronic contracting between the Data Controller and the Service User on the basis of the General Terms and Conditions for the use of the Service
Legal basis for data processing	Article 6(1)(c) GDPR: fulfilment of a legal obligation: § 13/A of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services
Categories of Affected Persons	Service recipient
Scope of personal data	Natural person identification data and address required to identify the user
Data retention period	Until the end of the 5th year after the contract is performed or terminated
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR

Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	Providing the data is mandatory. If you do not provide the personal data, the Data Controller will not be able to enter into an electronic contract with you.

g.) recording of driving licence details

Purpose of data processing	To record the details of the service user's driving licence in order to comply with Section 5(2) of Act I of 1988 on Road Traffic, which states: "Driving a vehicle on the road is permitted only if you are in a fit state to drive safely and are in possession of the licence required to drive the vehicle."
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Subject to the General Terms and Conditions, the Service User shall.
Scope of personal data	Name, driving licence number and validity, country of issue
Data retention time	Until the end of the 1st year after cancellation of registration
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s):

	<ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to provide you with services.

h.) checking the existence and validity of driving licences

Purpose of data processing	Verification of the existence and validity of the service user's driving licence by uploading a copy of the driving licence in order to comply with Article 5(2) of Act I of 1988 on Road Traffic, which states that: "Driving a vehicle on the road is permitted only if you are in a fit state to drive safely and have the required licence to drive the vehicle."
Legal basis for data processing	Article 6(1)(f) GDPR: legitimate interest
Categories of Affected Persons	Subject to the General Terms and Conditions, the recipient of the service
Scope of personal data	Personal data on the front and back of the driving licence, such as name, driving licence number and date of issue, photograph A copy of both sides of the driving licence by uploading a copy of the driving licence of the service user. A photograph of the service recipient taken simultaneously of him/herself and the front of the driving licence
Data retention time	The Data Controller will store a copy of the driving licence for 3 days after uploading and will then delete it from its system.
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR

Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to provide you with services.

i.) Verification of the document confirming the proof of residence

Purpose of data processing	The verification of the document confirming the user's address ensures the verifiability of the provided data and facilitates a secure transaction between the parties involved.
Legal basis for data processing	Article 6(1)(f) GDPR: legitimate interest
Categories of Affected Persons	Subject to the General Terms and Conditions, the recipient of the service
Scope of personal data	The personal data on the front side of the document confirming the address include name, place and date of birth, address, residence address, mother's name, date of issue, and date of document issuance. A photograph of the service recipient taken simultaneously of him/herself and the front of the driving licence
Data retention time	The Data Controller will store a copy of the front side of the document confirming the address for 3 days after uploading and will then delete it from its system.
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s):

	<ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to provide you with services.

j.) checking the existence and validity of your address card

Purpose of data processing	Checking the existence and validity of the address card of the service recipient (official proof of address) by uploading a copy of the address card to check for misuse and possible legal claims
Legal basis for data processing	Article 6(1)(f) GDPR: legitimate interest
Categories of Affected Persons	Subject to the General Terms and Conditions, the recipient of the service
Scope of personal data	<p>Personal data on the front of the address card, such as name, address card number and date of issue, place and date of birth, mother's name, place of residence, place of stay</p> <p>A copy of the front side of the address card by uploading a copy of the address card of the service recipient. The copy of the back of the address card is not uploaded and its data content is not required at all.</p> <p>A photograph of the service recipient taken of him/herself and the front of the address card at the same time</p>
Data retention period	The Data Controller will store a copy of the front of the address card only for the time strictly necessary to verify the personal data, for 60 days after uploading, and will then permanently delete it from its system.

Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the service user
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to provide you with services.

k.) payment for the service

Purpose of data processing	Payment for the service by OTP SimplePay credit card
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Service recipient
Scope of personal data	Surname, first name, bank account number
Data retention period	Pursuant to paragraphs (1) and (2) of § 169 of the Accounting Act 8 years
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller does not use data processors. During the use of OTP SimplePay, OTP Mobil Kft. (1143 Budapest, Hungária krt. 17-19., company registration number: 01-09-174466) has access to the personal data as the independent Data Controller:

	<p>✓ OTP Mobil Kft.'s Privacy Policy: https://simplepay.hu/adatkezelesi-taj-ekoztatok/</p>
Source of data	The source of personal data is the service user
How to provide data, consequences	Providing the data is mandatory. If you do not provide the personal data, the Data Controller will not be able to provide you with services.

I.) billing

Purpose of data processing	Issuing an invoice
Legal basis for data processing	Article 6(1)(c) GDPR: fulfilment of a legal obligation: section 159(1) of the VAT Act
Categories of Affected Persons	Service recipient
Scope of personal data	Name, address, tax number (for companies), email address
Data retention period	Pursuant to paragraphs (1) and (2) of § 169 of the Accounting Act 8 years
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	<p>The Data Controller uses Data Processor(s):</p> <ul style="list-style-type: none"> • accounting by Royal Corporation AUDIT Kft. (head office: 1111 Budapest, Bartók Béla út 14. 1. floor. door 10, company registration number: 01-09-956210) • billing software operator of szamlazz.hu: KBOSS.hu Kft. (registered office: 1031 Budapest, Záhony utca 7. company registration number: 01-09-303201)

	The Data Controller shall provide data to the National Tax and Customs Administration (NAV) in accordance with point 1 of Annex 10 of Act CXXVII of 2007 on Value Added Tax (VAT Act).
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	Providing the data is mandatory. If you do not provide the personal data, the Data Controller will not be able to fulfil its legal obligation to invoice.

m.) electronic contracting between Car owner and Tenant

Purpose of data processing	Electronic contracting between the Lessor and the Lessee for the use of the service under the General Terms and Conditions
Legal basis for data processing	Article 6(1)(c) GDPR: fulfilment of a legal obligation: § 13/A of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services
Categories of Affected Persons	Car owner and Tenant
Scope of personal data	Natural person identification data and address, driving licence number required to identify the user
Data retention period	Until the end of the 5th year after the contract is performed or terminated
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> ● hosting provider: DigitalOcean LLC; Google Cloud server in Europe ● website developer and system administrator: RentBen Kft. (registered

	office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	Providing the data is mandatory. If you do not provide personal data, you will not be able to use the service.

n.) liaising between Car owner and Tenant

Purpose of data processing	Liaising and negotiating between the Lessor and the Lessee on the details of the handover of the vehicle
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Car owner and tenant
Scope of personal data	Name, telephone number
Data retention time	Until the end of the 1st year after cancellation of registration
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the recipient of the service
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Parties will not be able to reconcile.

--	--

o.) opinion, evaluation

Purpose of data processing	Evaluation of the use of the service in relation to the letting
Legal basis for data processing	Article 6(1)(a) GDPR: consent
Categories of Affected Persons	Car owner and tenant
Scope of personal data	Assessor name and profile Evaluated name and profile picture
Data retention time	Until the end of the 1st year after cancellation of registration
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of personal data is the service user
How to provide data, consequences	The provision of data is voluntary. If you do not provide personal data, you will not be able to evaluate the service

p.) customer service

Purpose of data processing	Customer service as a data processor with its service Arenim Technologies Kft.: for settlements, compensation claims, requests for information, general information
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking

	steps at the request of the Data Subject prior to the conclusion of the contract
Categories of Affected Persons	Service recipient
Scope of personal data	The following data will be collected: name, telephone number, email address, personal data related to settlements and claims, requests for information and general information No audio recording is made
Data retention time	Until the end of the 5th year after the contract is performed or terminated
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s): <ul style="list-style-type: none"> ● hosting provider: DigitalOcean LLC; Google Cloud server in Europe ● website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698) ● mail system provider: Google Ireland Ltd. (based in Google Building Gordon House, Barrow St, Dublin 4, Ireland) ● Call center provider: Arenim Technologies Kft. (registered office: 1095 Budapest, Lechner Ödön fasor 6.)
Source of data	The source of personal data is the service user
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to assist you in the administration of your case. We retain the recording of phone conversations for 3 years following the end of the call for quality assurance purposes.

q.) voice recording during telephone calls

Purpose of data processing	Recording a telephone conversation
Legal basis for data processing	Article 6(1)(a) GDPR: consent
Categories of Affected Persons	Client
Scope of personal data	Name, phone number, voice recording
Data retention period	Until the consent is withdrawn, but not later than the end of the 60th day after the sound recording was made
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller does not use Data Processor(s). The audio recordings are stored by the Data Controller on its own servers.
Source of data	Source of personal data is the customer
How to provide data, consequences	The provision of data is voluntary. If you do not give your consent, the Data Controller will not be able to record the audio recording.

r.) maintaining a list of users who are in breach of contract

Purpose of data processing	Maintaining a list of users who are in breach of the Terms and Conditions, so that the Data Controller knows which users have breached the Terms and Conditions or committed an act that restricts the use of the service
Legal basis for data processing	Article 6(1)(f) GDPR: legitimate interest
Categories of Affected Persons	Service recipient
Scope of personal data	Name, driving licence number, address, personal data relating to the breach of contract
Data retention period	For 5 years from the date of inclusion on the list of non-compliant users
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller uses Data Processor(s):

	<ul style="list-style-type: none"> • hosting provider: DigitalOcean LLC; Google Cloud server in Europe • website developer and system administrator: RentBen Kft. (registered office: 1072 Budapest, Akácfa u. 7. 2. em. 1, company registration number: 01-09-370698)
Source of data	The source of the personal data is an employee of the Data Controller
How to provide data, consequences	The data must be provided. If the personal data are not available, the Data Controller cannot keep records

s.) asserting a legal claim

Purpose of data processing	Enforcing a claim in the event of a debt
Legal basis for data processing	Article 6 (1) (c) GDPR: Civil Code. 6:138 § (Right to demand performance)
Categories of Affected Persons	Service recipient
Scope of personal data	Name, address, personal data relating to the enforcement of claims
Data retention time	Until the end of the 5th year after the contract is performed or terminated
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	<p>The Data Controller may transfer the data to the following Recipients:</p> <ul style="list-style-type: none"> • lawyer • claims management company • authority (police, court) • parking company • National Toll Payment Services Ltd. • National Tax and Customs Office (NAV) <p>In each case, individual information will be provided taking into account the circumstances of the case.</p>

Source of data	The source of the personal data is an employee of the Data Controller
How to provide data, consequences	The data must be provided. If the personal data are not available, the Data Controller will not be able to pursue a claim.

t.) complaint handling

Purpose of data processing	Handling a complaint about any service
Legal basis for data processing	Article 6(1)(c) GDPR: fulfilment of a legal obligation: the Consumer Protection Act CLV of 1997
Categories of Affected Persons	Customer
Scope of personal data	Name, address, place, time and manner of lodging the complaint, detailed description of the complaint, list of documents and other evidence produced by the consumer
Data retention period	Pursuant to Section 17/A (7) paragraph (7) of the Fgy.tv. 3 years
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller does not use Data Processor(s)
Source of data	The source of personal data is the consumer as complainant
How to provide data, consequences	The provision of data is voluntary. If you do not provide the personal data, the Data Controller may not be able to investigate your complaint.

u.) contractual relations

In the case of its contracted partners (suppliers), the Data Controller communicates and maintains business relations through its contact person as set out in the contract.

Purpose of data processing	Maintaining communication and cooperation in order to fulfil the purpose of the contract between the Data Controller and the Partner
Legal basis for data processing	Article 6(1)(f) GDPR: legitimate interest
Categories of Affected Persons	Employee of the partner (sole proprietor, LLC, Bt., Zrt.) as the designated contact person
Scope of personal data	Name, position, phone number, email address
Data retention time	Until the end of the 5th year after the contract is performed or terminated
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller does not use Data Processor(s)
Source of data	Source of personal data is the Partner's contact person
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to reconcile with the Partner

v.) insurance broker activity

Purpose of data processing	Insurance product brokerage: processing of data relating to an insurance offer (Uniqua Casco) requested by the Data Subject but not finalised The purpose of the processing is to complete the contracting process and conclude the contract
Legal basis for data processing	GDPR Article 6 (1) (b): necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract: conclusion of the insurance contract pursuant to Act LXXXVIII of 2014 on Insurance Activities (Bit.)

Categories of Affected Persons	Car owner
Scope of personal data	Name, registration number, chassis number, vehicle category
Data retention period	Enforcement of a legal claim under Article 17(3)(e) of the GDPR
Data transmission	No transfer of data pursuant to Articles 44-49 of the GDPR
Addressees	The Data Controller does not use Data Processor(s) The Data Controller will transfer data to the insurer as a separate Data Controller for the purpose of the performance of the contract: <ul style="list-style-type: none"> • UNIQA Biztosító Zrt. (registered office: 1134 Budapest, Róbert Károly körút 70-74., company registration number: 01-10-041515)
Source of data	Source of personal data is the Car owner
How to provide data, consequences	The data must be provided. If you do not provide the personal data, the Data Controller will not be able to send you a security offer.

6. Website data management

The Website uses cookies.

A cookie is a file that is placed on your computer when you visit a website. A cookie is a packet of information that the server sends to the browser, and then each time you request a cookie, the browser sends it back to the server with the data content specified by the server. The purpose of this is to save the web settings of the website you are visiting, so that when you visit the same website again from the same device, the site will remember the parameters you have set.

The cookie has countless functions. Cookies are most often used to personalise ads, services and analyse website traffic.

Under current legislation, cookies can only be stored on your device if they are absolutely necessary, i.e. they are essential for the website to function, and are called "necessary cookies". For all other types of cookies, your consent is required. You can view and set the cookies currently used on the website in a pop-up window when you access the website.

Modern browsers allow you to change cookie settings. Some browsers automatically accept cookies by default, but you can change this setting to prevent automatic acceptance in the future. If you change this setting, the browser will offer you the option to set cookies each time you change it.

Given that the cookies are intended to support and facilitate the usability and processes of the website, it cannot be guaranteed that you will be able to use all the features of the website to their full extent if you disable cookies. The website may then function differently than intended in the browser. For more detailed information on cookie settings for the browsers below:

- [Google Chrome](#)
- [Firefox](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Internet Explorer 10](#)
- [Microsoft Internet Explorer 9](#)
- [Microsoft Internet Explorer 8](#)
- [Microsoft Edge](#)
- [Safari](#)

7. Social media

The Data Controller is available on the following social networking sites.

The operator of the social networking site is considered as a separate Data Controller, information on data management is available at the following links:

Community page:	Name of data controller:	Contact details of the Privacy Notice:
Facebook	Meta Platforms Ireland Ltd. (based at 4 Grand Canal Square, Grand Canal Harbour Dublin 2, Ireland)	https://www.facebook.com/privacy/explanation
Instagram	Meta Platforms Ireland Ltd. (based at 4 Grand Canal Square, Grand Canal Harbour Dublin 2, Ireland)	https://help.instagram.com/519522125107875/?helpref=hc_fnav
Youtube	Google LLC (Headquarters: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	https://policies.google.com/technologies/product-privacy?hl=hu

Tiktok	TikTok Technology Ltd., 10 Earlsfort Terrace, Dublin, D02 T380, Ireland)	https://www.tiktok.com/legal/privacy-policy-eea?lang=hu
---------------	---	---

The Data Controller does not record or process personal data about the user of the given social networking site in its internal database and system.

8. Access to data

Personal data may be accessed by the competent staff of the Data Controller to the extent necessary for the performance of their tasks.

9. Data security measures

The Data Controller shall take appropriate IT, technical and personnel measures to protect the personal data it processes against, inter alia, unauthorised access or unauthorised alteration.

10. Data Subjects' rights in relation to data processing and their content

About data management Right of access	Content of the Data Subject's right in relation to data processing
Right to information /Articles 13-14 of the GDPR/	You have the right to be informed of the fact and purposes of the processing at the time of obtaining your personal data. The Controller will also provide you with such additional information as is necessary to ensure fair and transparent processing, taking into account the specific circumstances and context in which the personal data are processed. You shall also be informed of the fact of profiling and its consequences.
Right of access /Article 15 of the GDPR/	You have the right to request information from as to whether or not your personal data is being processed and, if such processing is taking place, you have the right to be informed that the Data Controller: <ul style="list-style-type: none"> ● what personal data ● on what legal basis ● for what processing purpose ● how long it treats

	<ul style="list-style-type: none"> ● to whom, when, under which law, to which personal data, to whom you have given access or to whom you have transferred your personal data ● the source of your personal data (if not provided by you to the Data Controller) ● whether it uses automated decision-making and its logic, including profiling.
Right to rectification /Article 16 of the GDPR/	You have the right to have inaccurate personal data concerning you corrected or incomplete personal data completed by the Data Controller at your request. You may therefore request that the Controller amend any of your personal data (for example, you may change your e-mail address or other contact details at any time).
Right to erasure ("right to be forgotten") /Article 17 of the GDPR/	You have the right to have your personal data deleted by the Data Controller at your request if one of the following grounds applies: <ul style="list-style-type: none"> ● your personal data are no longer necessary for the purposes for which they were collected or otherwise processed ● you withdraw your consent on the basis of which the processing was based pursuant to Article 6(1)(a) or Article 9(2)(a) and there is no other legal basis for the processing ● you object to processing on the basis of Article 21(1) and there is no overriding legitimate ground for processing, or you object to processing on the basis of Article 21(2) ● your personal data have been unlawfully processed ● your personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject ● your personal data have been collected in connection with the provision of information society services referred to in Article 8(1).
Right to restriction /Article 18 of the GDPR/	You have the right to have the Controller restrict the processing of your personal data at your request if one of the following grounds applies: <ul style="list-style-type: none"> ● You contest the accuracy of your personal data (in which case the limitation applies for the period of time that allows the Controller to verify the accuracy of the personal data)

	<ul style="list-style-type: none"> ● the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use ● the Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of a legal claim <p>You have objected to the processing pursuant to Article 21(1) (in which case the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over your legitimate grounds).</p>
Right to data portability /Article 20 of the GDPR/	<p>You have the right to receive personal data concerning you which you have provided to a Data Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another Data Controller without hindrance from the Data Controller to which you have provided the personal data, if:</p> <ul style="list-style-type: none"> ● the processing is based on consent within the meaning of Article 6(1)(a) or Article 9(2)(a), or on a contract within the meaning of Article 6(1)(b), and ● the processing is carried out by automated means. <p>You have the right to request, where technically feasible, direct transfer of your personal data between Data Controllers.</p>
Right to object /Article 21 of the GDPR/	<p>You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on Article 6(1)(e) or (f), including profiling based on those provisions. In such a case, the Controller may no longer process your personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.</p> <p>If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for these purposes, including profiling, where it is related to direct marketing.</p>
Right to withdraw consent /Article 7(3) GDPR/	<p>You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal. You must be informed of this before consent is given. The</p>

	withdrawal of consent shall be made possible in the same simple manner as the granting of consent.
--	--

11. Data subject's rights of redress in relation to data processing and their content

Legal remedies	Content of the remedy
Right to complain to the Supervisory Authority /Article 77 of the GDPR/	If your right to the protection of your personal data is infringed, you may lodge a complaint with the following Authority: National Authority for Data Protection and Freedom of Information head office: 1055 Budapest, Falk Miksa utca 9-11. mailing address: 1363 Budapest, Pf. 9. phone: +36 (1) 391-1400 email: ugyfelszolgalat@naih.hu Website: www.naih.hu
The right to an effective judicial remedy against the Controller or the Processor (initiation of legal proceedings) /Article 79 of the GDPR/	You have the right to take legal action against the Controller or Processor if you consider that the processing of your personal data is unlawful. The court will decide the case out of turn. In such a case, you are free to decide whether to bring your action before the competent court in your place of residence or domicile. The courts can be contacted at: https://birosag.hu/torvenyszekek

12. Update of the Privacy Notice

The Data Controller reserves the right to unilaterally amend this Privacy Notice. In particular, this Privacy Notice may be amended if necessary due to changes in legislation, data protection authority practices, business needs or other circumstances. At the Data Subject's request, the Controller shall send him a copy of the current version of the Privacy Notice in the form agreed with him.

Budapest, 6 February 2023.