

## Privacy Policy of the We Love Budapest website

### Summary of the Privacy Policy

The purpose of the Summary of the Privacy Policy is to briefly describe the scope of personal data we process and the method of data processing in connection with your use of the website ('Website') available at: <https://welovebudapest.com>.

<b>Controller</b>
We Love Budapest Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (registration number: 01-09-174253; seat: H-1011 Budapest, Székely utca 2-4. 1. em. 1/1A, Hungary; e-mail address: <a href="mailto:info@welovebudapest.com">info@welovebudapest.com</a> ; 'We Love Budapest', or 'us')
<b>Purpose and legal basis of data processing</b>
In connection with the operation, maintenance and the provision of the Website as an information society service, we process your personal data for the purposes as follows: <ul style="list-style-type: none"><li>• <b>Online content provision:</b> as a part of operating the Website, in order to provide you with our content and services, we place cookies on your device used for browsing as per our Cookie Notice. In the case of functional cookies, data processing is based on our legitimate interest.</li><li>• <b>Analytics:</b> we keep and evaluate the information about your last visits on our Website and how you navigate between different parts of it for analytic purposes in order to understand how people use our Website so that we could make it even more intuitive; for this purpose, we rely on your consent.</li><li>• <b>Targeted advertisements:</b> we use the information based on the articles you read to show you advertisements that you may find interesting; in this context, we rely on your consent for this purpose.</li><li>• <b>Conducting prize games:</b> when conducting prize games on the Facebook page of our Website according to our Rules on Prize Games, the processing of your data about your participation, selecting the winner, communication with the winner and the delivery of the prize is based on your consent. In connection with the prize games, we are obliged by the law to keep hold of Value Added Tax and accounting invoices that may contain your personal data.</li><li>• <b>Use of the function 'Recommend a place!':</b> when receiving and processing your recommendation given via the Webpage's 'Recommend a place!' function, we process your email address and the content of your recommendation based on our legitimate interest.</li><li>• <b>Newsletter service:</b> based on your consent we process your email address to send you notifications about our activities.</li><li>• <b>Responding to inquiries:</b> processing your personal data is necessary to manage your questions and complaints in your inquiry, which processing is based on our legitimate interest.</li></ul>
<b>Recipients of data transfer</b>
We may share your personal data with our service providers and cooperating partners helping us in our activity operating inside and outside the territory of the European Union. Appropriate guarantees have been inducted and we maintain the security of your data.
<b>Your rights</b>
You have the right to freely withdraw your consent at any time without restriction in case of processing data based on consent. Withdrawal of consent shall not affect the lawfulness of processing data based on consent prior to withdrawal.  You have right to request information from us about your personal data processed, you have the right to rectification, the right to object and the right to erasure personal data with certain limits, the right to request a copy of the data, to exercise your right to data portability or to request partly the restriction of processing.
<b>RIGHT TO OBJECT</b>
<b>You are entitled to object against processing your personal data at any time, for reasons related to your special situation; in this case we might no longer process your personal data. Should you have the right to object, and you exercise it, your personal data will no longer be processed for such purposes by us. There is not any cost for exercising this right.</b>
For further information, please read the <b>Full Privacy Policy. – v.0.99, 2022.08.29</b>

## We Love Budapest Website – Full Privacy Policy

v.0.99, 2022.08.29

The Purpose of the Privacy Policy is to describe the scope of personal data we process and the method of data processing in connection with your use of the website (**'Website'**) available at: <https://welovebudapest.com>.

<b>Controller</b>	We Love Budapest Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (registration number: 01-09-174253; seat: H-1011 Budapest, Székely utca 2-4. 1. em. 1/1A, Hungary; e-mail address: <a href="mailto:info@welovebudapest.com">info@welovebudapest.com</a> ; <b>'We Love Budapest'</b> , or <b>'us'</b> )
<b>Purpose of processing personal data</b>	<p>In connection with the operation, maintenance and the provision of the Website as an information society service, we process your personal data for the following purposes:</p> <ul style="list-style-type: none"><li>• <b>Online content provision:</b> as a part of operating the Website, in order to provide you with our content and services, we place cookies on your device used for browsing as per our Cookie Notice. In the case of functional cookies, data processing is based on our legitimate interest.</li><li>• <b>Analytics:</b> we keep and evaluate the information about your last visits on our Website and how you navigate between different parts of it for analytic purposes in order to understand how people use our Website so that we could make it even more intuitive; for this purpose, we rely on your consent.</li><li>• <b>Targeted advertisements:</b> we use the information based on the articles you read to show you advertisements that you may find interesting; we rely on your consent for this purpose.</li><li>• <b>Conducting prize games:</b> when conducting prize games on the Facebook page of our Website according to our Rules on Prize Games, the processing of your data about your participation, selecting the winner, communication with the winner and the delivery of the prize is based on your consent. In connection with the prize games, we are obliged by the law to keep hold of Value Added Tax and accounting invoices that may contain your personal data.</li><li>• <b>Use of the function 'Recommend a place!':</b> when receiving and processing your recommendation given via the Webpage's 'Recommend a place!' function, we process your email address and the content of your recommendation based on our legitimate interest.</li><li>• <b>Newsletter service:</b> based on your consent we process your email address to send you notifications about our activities.</li><li>• <b>Responding to inquiries:</b> processing your personal data is necessary to manage your questions and complaints in your inquiry, which processing is based on our legitimate interest.</li></ul>
<b>Categories of personal data processed</b>	<p>We process the following personal data for the above-mentioned purposes:</p> <ul style="list-style-type: none"><li>• <b>Contact data:</b> contact details, content of inquiry.</li><li>• <b>Data necessary for conducting prize games:</b> Facebook username, profile picture, User ID, content of comment.</li><li>• <b>Data of the winner of the prize game:</b> winner's name, gender, email address, postal address, telephone number, name of the account managing bank and bank account number.</li><li>• <b>User data:</b> cookie IDs, device data.</li></ul>
<b>Legal basis of processing personal data</b>	<p>We rely on the following legal bases when processing your personal data:</p> <ul style="list-style-type: none"><li>• In case of your consent, we process your personal data based on Article 6(1)(a) of the GDPR.</li></ul>

- On the basis of performance of legal obligation based on Article 6(1)(c) of the GDPR.
- Our or third party's legitimate interest pursuant to Article 6(1)(f) of the GDPR.

We process your personal data based on the legal bases for the purposes as follows:

Purpose of data processing	Categories of personal data processed	Legal basis
Online content provision	User data	Legitimate interest
Analytics	User data	Consent
Targeted advertisements	User data	Consent
Conducting prize games	Data necessary for conducting prize games Data of the winner of the prize game	Consent Legal obligation
Use of the function 'Recommend a place!'	Contact data	Legitimate interest
Newsletter service	Contact data	Consent
Responding to inquiries	Contact data	Legitimate interest

When maintaining the Website, it is in our legitimate interest to place certain data on your device used for browsing to ensure the basic operation of the Website. It comes with the necessary and proportionate limitation to your right to data protection as in this case it is preceded by our legitimate interest for the basic operation of our Website. Furthermore, in case you consented, we have the possibility to place certain data in connection with convenience, analytics and marketing purposes on your device.

When you send us a recommendation using the 'Recommend a place!' function of our Website, it is in our legitimate interest and can be reasonably expected to review and process the information in your recommendation and to use it to create content for our Website.

It is also in our legitimate interest to manage and respond to your requests, questions and complaints you send us, and to involve external services, such as a law firm, if necessary. You may reasonably expect us to process your personal data in connection with your inquiry.

If you require further information about our legitimate interests, please contact us via our email address [info@welovebudapest.com](mailto:info@welovebudapest.com).

**Duration of the storage of your personal data**

We process your personal data only for the period that is necessary to perform our obligations and services, and to achieve the aim for which we collected the data. If processing your personal data is no longer necessary, we delete your data.

- Data processed on the basis of your consent will be processed until you withdraw your consent.
- Your inquiries will be preserved for one year.
- Data related to conducting prize games and the data of the winner that are necessary to hand over the prize are processed until the winner has received the prize.
- We preserve the data necessary to comply with our obligation of keeping hold of Value-Added-Tax-related invoices for five years.
- We preserve the data necessary to comply with our obligation of keeping hold of accounting-related invoices for eight years.

	<ul style="list-style-type: none"> <li>We process the data in connection with operating the Website (online content providing, analytics, targeted advertisements) until the end of your session, with a maximum of one year.</li> </ul>																					
<b>Recipients of data transfer</b>	<p>Your personal data may only be accessed on a ‘need-to-know basis’ by our authorised employees and by our service provider business partners’ employees.</p> <p>We transfer your personal data for the following categories of recipients:</p> <ul style="list-style-type: none"> <li><b>Data processors:</b> we may transfer your personal data to certain third parties in order to process the data on our behalf in accordance with instructions and for the purpose of the processing. These processors are contractually obliged to implement appropriate technical and organisational measures to protect the personal data and to process the personal data only in accordance with the instructions.</li> </ul> <table border="1" data-bbox="456 632 1398 1037"> <thead> <tr> <th>Data processor</th> <th>Seat</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>Hydra Solutions Kft.</td> <td>H-1036 Budapest, Lajos u. 131., Hungary</td> <td>Website operation and development</td> </tr> <tr> <td>The Rocket Science Group, LLC</td> <td>675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA</td> <td>MailChimp email and newsletter service</td> </tr> <tr> <td>Be Social Kft.</td> <td>H-1037 Budapest, Seregély u. 5-7., Hungary</td> <td>Conducting prize games</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li><b>Joint controllers:</b> we may share or process your data together with certain external service providers (Facebook, Instagram, Google, Youtube), if we use their services, for example in cases of operating fan pages, conducting analytics and marketing purposes.</li> </ul> <table border="1" data-bbox="456 1209 1411 1843"> <thead> <tr> <th>Name and seat of joint controller</th> <th>Services</th> <th>Content of joint controller agreement</th> </tr> </thead> <tbody> <tr> <td>Meta Platforms Ireland Limited, Hanover Reach 5-7 Hanover Quay, Dublin 2, Ireland</td> <td>Facebook.com Instagram.com and their plug-ins</td> <td>Meta Platforms Ireland Limited (Facebook) is regarded as joint controller during the joint controller activities, information of which is available in Facebook Ireland’s Privacy Notice here: <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>, where you can find further information about how Facebook processes your data, including legal basis and the possibilities to exercise your data subject rights with Facebook as the data controller.</td> </tr> <tr> <td>Google Ireland Ltd, Gordon House, Barrow Street,</td> <td>Google Analytics</td> <td>The Website uses the Google Analytics service, and in connection with the data shared and used within the service, Google is considered a joint controller under the GDPR. <a href="https://support.google.com/analytics/answer/9024351?hl=hu">https://support.google.com/analytics/answer/9024351?hl=hu</a></td> </tr> </tbody> </table>	Data processor	Seat	Activity	Hydra Solutions Kft.	H-1036 Budapest, Lajos u. 131., Hungary	Website operation and development	The Rocket Science Group, LLC	675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA	MailChimp email and newsletter service	Be Social Kft.	H-1037 Budapest, Seregély u. 5-7., Hungary	Conducting prize games	Name and seat of joint controller	Services	Content of joint controller agreement	Meta Platforms Ireland Limited, Hanover Reach 5-7 Hanover Quay, Dublin 2, Ireland	Facebook.com Instagram.com and their plug-ins	Meta Platforms Ireland Limited (Facebook) is regarded as joint controller during the joint controller activities, information of which is available in Facebook Ireland’s Privacy Notice here: <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a> , where you can find further information about how Facebook processes your data, including legal basis and the possibilities to exercise your data subject rights with Facebook as the data controller.	Google Ireland Ltd, Gordon House, Barrow Street,	Google Analytics	The Website uses the Google Analytics service, and in connection with the data shared and used within the service, Google is considered a joint controller under the GDPR. <a href="https://support.google.com/analytics/answer/9024351?hl=hu">https://support.google.com/analytics/answer/9024351?hl=hu</a>
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Dublin 4, Ireland				
<p><b>International data transfers</b></p>	<p>In connection with the use of the Website, we may transfer your personal data to countries outside the European Economic Area ('EEA'), to the United States of America. If we transfer your personal data outside the EEA, we take appropriate measures to ensure that your personal data is adequately protected, regardless of the country to which the data is transferred, in compliance with our legal obligations. Such a measure might be an EU Commission decision on data protection compliance or, for example, requiring and obtaining contractual commitment from any third party with access to personal data that ensures that your personal data receives at least the same protection as within the EEA. We provide a copy of the guarantees on request regarding personal data transferred outside the EEA, or if you need further information on these measures, please contact us at our contact details that you can find above.</p>			
<p><b>Your rights</b></p>	<p>When we process your data based on your consent, you may withdraw it at any time, in which case we erase your data processed based on your consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>You have the following rights in relation to our data processing:</p> <ol style="list-style-type: none"> <li>1. <b>Right to access:</b> You are entitled to receive verification/feedback from us regarding to whether or not your personal data is being processed, and if so, you have the right to access your personal data.</li> <li>2. <b>Right to rectification:</b> You have the right to rectification of your personal data on request.</li> <li>3. <b>Right to object:</b> <div data-bbox="534 1129 1382 1297" style="border: 1px solid black; padding: 5px;"> <p><b>You are entitled to object against processing your personal data at any time, for reasons related to your special situation; in this case it may be required from us to stop processing your personal data. Should you have the right to object, and you exercise it, your personal data will no longer be processed for such purposes. There is not any cost for exercising this right.</b></p> </div> </li> <li>4. <b>Right to restriction of processing:</b> You have the right to request the restriction of processing your personal data.</li> <li>5. <b>Right to erasure ('right to be forgotten'):</b> You are entitled to request the erasure of your personal data.</li> <li>6. <b>Right to data portability:</b> You have the right to receive your personal data provided and available for us, in a structured, commonly used and machine-readable format, furthermore you are entitled to transfer these personal data to another controller without hindrance.</li> </ol> <p>You have the right to submit a complaint with the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., phone number: +36-1-391-1400, fax: +36-1-391-1410, e-mail: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>) concerning the data processing of We Love Budapest.</p>			