

Privacy Policy

about the data processing by Mezna For You Llc.. on the website <https://aisb.mezna.hu/>

Definitions.

Data Controller or Controller: means 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

For the purposes of the processing under present Policy, the following person is the Data Controller; the Data Controller is an independent Data Controller in relation to the processing detailed in present Policy and has determined and defines the purposes of the processing alone.

Name	MEZNA FOR YOU Limited Liability Company
seat:	1132 Budapest, Kresz Géza utca 37. A. ép. 3. em. 14.
reg.nr:	01-09-403179 (Metropolitan Court)
tax nr.:	32023907-2-41
stat.nr.	32023907-5629-113-01
EU identification nr.:	HUOCCSZ.01-09-403179
reptesented by	Bajor Laluk Zsófia and Nábelek Zsófia CEOs
e-mail:	aisb@mezna.hu
phone nr.:	<feltöltendő>
DPO:	the Data Controller is not obliged to employ a data protection officer

Processor: means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

Processing: means 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.

Restriction of processing: means the marking of stored personal data with the aim of limiting their processing in the future.

Personal data breach: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

AISB: Budapest American International School Foundation (registration number: 5447; registered office: 2094 Nagykovácsi, Nagykovácsi út 12., represented by Lóránt Kibédi Varga, Chairman of the Board).

Automated decision-making: means decisions made using technology without human intervention.

GTC: The General Terms and Conditions applied by the Data Controller to the legal relationship established on the Website.

Recipient: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing

Data subject means an identified or identifiable natural person to whom the data relates.

User: the legal representative of the Pupil who enters into a Contract with the Service Provider on behalf of the Pupil as a beneficiary, or an employee of AISB who enters into a Contract with the Service Provider on his/her own behalf.

By accepting GTC, the User, unless acting on his/her own behalf, declares that he/she is the legal representative of the Pupil, and if the User exercises the legal right of supervision jointly with another person, he/she declares and warrants that he/she acts in the context of the Contract with the consent and express authorisation of the other legal representative when using the Site.

By accepting GTC on the Website, the User expressly declares that the data provided during the Registration are true and correct and that he/she will not disclose them, or any other data used to access the Account to third parties, nor will he/she provide them to third parties. The Service Provider shall not enter a Contract with a person who is not a Legal Representative of the Pupil or who is not an employee of AISB within the scope of the GTC.

Account: the User's password-protected access to the Website, where the Service Provider manages the User's orders and Contracts and where information related to the legal relationship of the Parties is displayed to the User.

The Account is created upon the User's registration and terminated upon the Service Provider's cancellation, which will take place at the time the User's or the Pupil's relationship with AISB is terminated for any reason.

GDPR: 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)

Third party: means 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.

Third country: any country outside the European Union and the European Economic Area is considered a third country.

Authority: Nemzeti Adatvédelmi és Információszabadság Hatóság, whose current contact details can be found at www.naih.hu.

Newsletter: an electronic communication sent by the Service Provider to the User containing a direct marketing offer.

Site: <https://aisb.mezna.hu/>

Infotv.: Az információs önrendelkezési jogról és az információszabadságról szóló 2011. évi CXII. törvény.

OTP SimplePay: OTP Mobil Szolgáltató Kft. (seat: 1143 Budapest, Hungária krt. 17-19.; Cg. 01-09-174466).

Profiling: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Számv. tv.: 2000. évi C. törvény a számvitelről.

Personal data: means 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, 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.

Contract: A catering relationship between the User and the Service Provider, the beneficiary of which is the Pupil, unless the User is an AISB employee who orders meals for himself/herself.

The Contract shall be deemed to be a written contract.

The Service Provider does not apply a code of conduct but declares that it will comply with all the requirements expected by AISB at all times and will apply the rules and regulations prescribed by AISB at all times.

The language of the Contract shall in all cases be Hungarian.

Tanuló: Pupil: the person having a pre-school placement or educational relationship with AISB, who is the beneficiary of the Contract and in whose name and on whose behalf the User acts.

Policy: present Privacy Policy.

Preamble.

The Data Controller shall always during its data management activities endeavour to take data security measures appropriate to the data processed and to maintain such data security measures without interruption.

Personal data shall be stored by the Controller in a closed system, ensuring the continuous availability, integrity, and confidentiality of the data.

The Data Controller shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the scale of the risk, taking into account the state of science and technology and the cost of implementation, the nature, scope, context and purposes of the processing, and the varying degrees of probability and severity of the risk to the rights and freedoms of data subjects, in order to guarantee a level of data security appropriate to the scale of the risk throughout the period of processing.

The Data Controller shall also pay particular attention to the continuous monitoring of and compliance with changes in legislation and to the creation of the widest possible framework for the exercise of the rights of data subjects.

The purpose of present Policy is to provide natural persons who enter into a legal relationship with the Data Controller through the use of the Website or subscribe to the newsletter service - in the terminology used in present Policy: the Data Subjects - with clear information about the data processing by the Data Controller, so that the entire process of data processing becomes transparent and provides them with a solid basis for exercising their rights as data subjects.

However, regardless of the Controller's objective, there may be occasions when there is a change in the processing, or an unforeseen data breach. In such cases, the Data Controller will inform the Data Subjects on the Website and, in the event of a data breach, will act in accordance with the relevant provisions of the GDPR.

Furthermore, during the processing, the Data Subject may have questions or requests, even though the processing is transparent to him/her. Answering these questions and fulfilling these requests is a priority for the Data Controller, which is why the Data Controller also endeavours to provide the Data Subject with the possibility of continuous communication.

1.Principles relating to processing of personal data

Personal data shall be:

processed lawfully, fairly and in a transparent manner in relation to the data subject ('**lawfulness, fairness and transparency**');
collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with GDPR's Article 89(1), not be considered to be incompatible with the initial purposes ('**purpose limitation**');
adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('**data minimisation**');
accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('**accuracy**');
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 stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with GDPR's Article 89(1) subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of the data subject ('**storage limitation**');
processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('**integrity and confidentiality**').
The Controller shall be responsible for and be able to demonstrate compliance ('**accountability**').

2. The processing activities and the regarding information.

2.1 Registration and Account.

The Pupil and his/her legal representative or an employee of AISB may register as a User on the Website to establish a legal relationship with the Data Controller as a Service Provider.

In the absence of Registration and User Account, the Data Controller cannot enter a Contract.

2.1.1. Purpose of data Processing	2.1.2. Legal basis for data processing	2.1.3. Data categories	2.1.4. Source of the data	2.1.5. Duration of the data processing	2.1.6. Cross border processing	2.1.7. Rights of the Data subject and Authority complain
Ensuring the technical conditions for the creation of Contracts and the continuous visibility of the status of Contracts for the User	<p>to take steps at the request of the Data subject (User) prior to the conclusion of the contract (Article 6(b) GDPR)</p> <p>on the basis of the data provided by the Pupil under point e.), the legal basis for processing is Article 9 (2) a) GDPR, the express consent of the User is given by ticking</p>	<p>User</p> <p>a.) first name b.) last name c.) e-mail address d.) ID number e.) date of the Registration f.) phone number g.) password h.) billing data (first name, last name, address)</p> <p>Pupil</p> <p>a.) first name b.) last name c.) AISB ID number d.) class</p>	User and in case of Pupil c,) AISB	until the Account expires.	The Data Controller does not transfer personal data to third countries, nor does it plan to do so.	<p>a.) right to access b.) right to rectify c.) right to erasure d.) right to restriction e.) right to portability</p> <p>with respect to the processing of the Pupil's data under e.), the User may withdraw the consent to the processing at any time and without giving reasons, in an informal manner (e.g. by checking the relevant checkbox) which does not affect the lawfulness of the</p>

	the relevant checkbox.	e.) allergy				processing carried out then. * the detailed content of the subjects' rights is set out in point 4 of present Policy The Data Subject also has the right to lodge a complaint directly with the AUTHORITY in accordance with point 5 of present Policy.
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2.2.Data processing regarding the Contract.

2.2.1. Purpose of data Processing	2.2.2. Legal basis for data processing	2.2.3. Data categories	2.2.4. Source of the data	2.2.5. Duration of the data processing	2.2.6. Cross border processing	2.2.7. Rights of the Data subject and Authority complaints	2.2.8. Profiling and automated decision-making
primarily the performance of the Contract and secondly, the fulfilment of the obligation set out in Article 169 (1) of the Act on Accounting: the enterprise shall	primarily the performance of the Contract to which the Data Subject is a party (Article 6(b) GDPR) and secondarily, the performance of a legal	a.) first name (Pupil and User) b.) last name (Pupil and User) c.) e-mail address (User) d.) ID number (system-data) e.) date and place of the Contract (system-data)	a.)-f.) User g.)-h) Financial Provider	until the Account expires.	The Data Controller does not transfer personal data to third countries, nor does it plan to do so.	f.) right to access g.) right to rectify h.) right to erase i.) right to restriction j.) right to portability *the detailed content of the data subjects' rights is set out in point 4 of present Policy The Data Subject also has the right to lodge a	The Data Subject shall not be subject to a decision based solely on automated processing which could have legal effects concerning him or her, or similarly significant decisions on him or her, nor shall such a decision be based on special category data

submit the annual accounts, the annual report and the supporting inventory, valuation and general ledger extracts for the financial year.	obligation on the Data Controller (Article 6(c) GDPR)	f.) financial data of the Contract (system-data) g.) bank card data (date of expiry, system-data)				<i>complaint directly with the AUTHORITY in accordance with point 5 of present Policy.</i>	
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Information about the availability of the Data Subjects' bank card, bank account and payment account details at the Data Controller.

The Data Controller does not receive from OTP Simplepay or third parties any financial or credit card data that could be used to debit the User's bank account or payment account or to withdraw any amount of money from it without the User's cooperation and prior consent.

Under no circumstances will the Data Controller receive a password or validation code (CVV/CVC code) associated with a User's credit card, bank account number or payment account.

The Data Controller receives from the cooperating payment service providers data in accordance with present Policy, which are transmitted firstly to the Data Controller to fulfil its legal accounting obligations and secondly to the Data Controller to enable the Data Controller to inform the User in case of an error in a payment transaction (e.g. card expiry, time overrun in the payment transaction) in order to fulfil the Contract.

The User also acknowledges that the following personal data stored by the Data Controller as the data controller on the Website, in its user database, will be transferred to OTP Mobil Kft. as the data processor. The data transmitted by the Data Controller are the following: name, email address, billing address (city, address, postal code, street number), selected items. The nature and purpose of the data processing activities carried out by the processor can be found in the SimplePay Data Processing Notice, at the link below:

<https://simplepay.hu/vasarlo-aff>

The Data Controller also draws your attention to the fact that the processing of data from bank cards used for on-line payment is carried out in accordance with the conditions set out by the card issuing company. Neither the Data Controller nor OTP Simplepay has access to the complete credit card data.

2.3. Data processing related to Newsletter subscriptions.

When using the Website, the User may subscribe to the Newsletter by ticking the relevant checkbox.

2.3.1. Purpose of data Processing	2.3.2. Legal basis for data processing	2.3.3. Data categories	2.3.4. Source of the data	2.3.5. Duration of the data processing	2.3.6. Cross border processing	2.3.7. Rights of the Data subject and Authority complaints	Profile de
Newsletter-sending	the express consent of the User (Article 6(a) GDPR) The User can give his/her explicit consent to subscribe to the newsletter by ticking the checkbox on the Website.	a.) e-mail address (User) b.) first name c.) last name	a.)-c.) User	until the consent given by the Data Subject is withdrawn, but at the latest until the User Account is no longer active.	The Data Controller does not transfer personal data to third countries, nor does it plan to do so.	a.) right to access b.) right to rectify c.) right to erase d.) right to restriction e.) right to portability f.) right to withdraw consent The Data Controller expressly informs the User that he/she may withdraw his/her consent to the processing under this subsection at any time: in an informal form addressed to the Data Controller or	The D be su based proces ha conce similar him or decis speci

						<p>by using the unsubscribe link in the Newsletter</p> <p><i>*the detailed content of the data subjects' rights is set out in point 4 of present Policy</i></p> <p><i>The Data Subject also has the right to lodge a complaint directly with the AUTHORITY in accordance with point 5 of present Policy.</i></p>	
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2.4.Data processing related to complaint handling and other enquiries

The data contained in the User's requests sent to the Data Controller via the <https://aisb.mezna.hu/bia-kapcsolat> subpage of the Website or by e-mail to aisb@mezna.hu will be processed as follows.

2.4.1. Purpose of data Processing	2.4.2. Legal basis for data processing	2.4.3. Data categories	2.4.4. Source of the data	2.4.5. Duration of the data processing	2.4.6. Cross border processing	2.4.7. Rights of the Data subject and Authority complaints	Profile de
compliant-handling and handling other enquiries	the express consent of the User (Article 6(a) GDPR)	a.) the data-categories of data are not predictable, given that their	User	until the Data Subject's consent is withdrawn, but no later than 3	The Data Controller does not transfer personal data to third countries, nor	g.) right to access h.) right to rectify i.) right to erase j.) right to restriction k.) right to portability	The D be su based proce ha

	<p>The express consent of the User, given by sending a complaint or other request.</p>	<p>selection is at the discretion of the User.</p>		<p>(three) calendar years from the investigation of the complaint or other matter.</p>	<p>does it plan to do so.</p>	<p>I.) right to withdraw consent</p> <p>The Data Controller expressly informs the User that he/she may withdraw his/her consent to the processing under this subsection at any time:</p> <p>in an informal form addressed to the Data Controller.</p> <p><i>*the detailed content of the data subjects' rights is set out in point 4 of present Policy</i></p> <p><i>The Data Subject also has the right to lodge a complaint directly with the AUTHORITY in accordance with point 5 of present Policy.</i></p>	<p>conce similar him or decis speci</p>
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3.The recipients.

During the data processing the Data Controller shall endeavour to ensure that the personal data it processes are only disclosed to the narrowest circle of persons, and that such persons may only obtain access to personal data in strict and consistent compliance with the applicable data protection rules.

However, this endeavour of the Data Controller shall not affect the case where the obligation to disclose the personal data of the data subject is based on a law or an administrative or judicial decision; in such a case, the Data Controller shall disclose the personal data to the third party concerned in accordance with the provisions of the applicable law, administrative or judicial decision and, where the law so provides, shall also inform the data subject of the disclosure by electronic means.

Furthermore, the Controller may, in connection with the exercise of its rights and the performance of its obligations, after careful consideration of all the circumstances of the individual case concerned, communicate personal data to a variable but specified group of persons, consisting of the Controller's accountant, tax adviser, legal adviser and persons responsible for the management of its payment reference numbers as recipients.

The above addressees shall be bound by a written obligation of lawfulness and confidentiality on the part of the Data Controller unless the addressee concerned is bound by a legal obligation of confidentiality.

In addition to the above, the recipients of the processing may also be the Data Processors of the Controller.

In its contracts with Data Processors, the Data Controller also takes into account all the requirements set out in Article 28 of the GDPR, with particular emphasis on ensuring that the Data Processor is not in a position to hold the personal data concerned in a controller capacity, that the Data Processor informs the Data Controller in detail and continuously about the processing it carries out and that the Data Processor treats the personal data of the Data Subject confidentially.

- The scope of the Data Processors may also vary, but the scope of the subjects in which the Data Controller wishes to use a Data Processor is voluntarily limited as follows.
- the developer and provider of the IT support for the Website:

Developer

name:	Tex and Co Network Kft.
seat:	1152 Budapest, Szentmihályi út 167-169. F213Q03.
tax nr.:	26164926-2-42
reg.nr.:	01-09-305406
e-mail:	info@texandco.hu

Hosting

name:	Tex and Co Network Kft.
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seat: 1152 Budapest, Szentmihályi út 167-169. F213Q03.
tax. nr.: 26164926-2-42
reg.nr.: 01-09-305406
e- mail: info@texandco.hu

- the on-line payment service provider involved in the performance of the Contract: OTP Simlpepay,
The Data Controller considers it of utmost importance to inform the Data Subjects that the Data Controller only and exclusively cooperates with a payment service provider whose legal operation and market experience and reputation are well known and which fulfils the data security requirements of payment transactions, in particular their encryption as a basic requirement.
- a financial institution involved in the performance of the Contract;
- a company providing accounting or bookkeeping services for the accounting of contracts.
- a company or individual entrepreneur providing a so-called customer relationship management system which may be used by the Data Controller.
- the Controller's legal representative, service provider providing assurance services.

4. The rights of the Data subject – according to the relevant NAIH-leaflet.

Pursuant to Articles 57(1)(f) and 77(1) of the GDPR, all data subjects, including you, have the right to lodge a complaint with the Authority if you consider that the processing of personal data concerning you infringes the General Data Protection Regulation. However, the Authority's practical experience shows that in the vast majority of cases, data controllers would cooperate with data subjects and restore the lawfulness of the processing on their own initiative if they received a specific request for the processing they object to.

The Authority therefore recommends that you contact the data controllers directly before lodging a complaint and exercise your data subjects' rights below to deal with cases more quickly and efficiently.

In principle any data subject can apply to the controller concerned:

- access to their personal data,
- rectification of their personal data,
- erasure of personal data,
- the restriction of the processing of personal data,

- the portability of his or her personal data,
- object to the processing of your personal data.

Whatever the request for the exercise of a data subject's right, the Controller must inform you of the action taken on the request without undue delay and in any event within one month of receipt of the request. If necessary, considering the complexity of the request and the number of requests, this time limit may be extended by a further two months. However, the controller must inform you of the extension, stating the reasons for the delay, within one month of receipt of the request.

If the controller fails to act on your request without delay, but at the latest within one month of receipt of the request, it must still inform you of the reasons for its failure to act and of the possibility to lodge a complaint with the Authority and exercise your right to judicial remedy before the competent court in the place where you reside or stay (for the contact details of the courts, please consult the following link: <http://birosag.hu/torvenyszekek>).

If the controller has reasonable doubts as to your identity when making a request to exercise a data subject right, the controller may ask you to provide additional information necessary to confirm your identity. If the controller demonstrates that it is not able to identify you, it may refuse to comply with a request to exercise a data subject right.

Information and action on requests from data subjects will, in principle, be free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may charge a reasonable fee, considering the administrative costs of providing the information or information requested or of taking the action requested, or refuse to act on the request. However, the burden of proving that the request is manifestly unfounded or excessive shall lie with the controller.

Article 37 of the General Data Protection Regulation specifies the cases in which the controller and the processor shall designate a DPO. For these controllers or processors, the Authority recommends that you make use of the assistance of the DPOs.

If the controller fails to comply with a request in a verifiable manner, taking into account the time limits set out above, the Authority will investigate the matter on the basis of a complaint.

- **- Your right to access your personal data**

Pursuant to this right, you have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is ongoing, the right to access your personal data and the information listed in the General Data Protection Regulation (e.g. the purposes of the processing, the legal basis for the processing, the recipients or categories of recipients of the personal data, in the case of transfers to third countries or international organisations, the information relating to; the duration or aspects of the processing, the data subject's rights, remedies, consequences of not providing the data).

The controller shall provide you with a copy of the personal data which are the subject of the processing. However, the Authority draws your attention to the fact that the controller may charge a reasonable fee based on administrative costs for the additional copies requested and that the exercise of the right to request a copy must not adversely affect the rights and freedoms of others.

- **Your right to rectify your personal data**

Under your right to rectification, you have the right to have inaccurate personal data relating to you rectified by the controller without undue delay upon your request, and the right to request that incomplete personal data be completed.

- **Your right to have your personal data erased and "forgotten"**

Generally, your right to erasure entitles you to have your personal data erased by the controller without undue delay at your request and obliges the controller to erase it without undue delay under certain conditions.

The right to "be forgotten" is an extension of the right to erasure to the online environment, whereby, if the controller has disclosed your personal data and is under an obligation to erase it, it must take reasonable steps to inform the controllers that process your personal data that you have requested the erasure of links to or copies of your personal data.

In relation to this data subject right, it is important to note, however, that the erasure and "forgetting" of personal data is not possible in one of the cases set out in Article 17(3) of the GDPR.

- **Your right to restrict the processing of your personal data**

- You have the right to obtain, at the controller's request, the restriction, commonly known as blocking, of processing of your personal data if one of the following conditions is met:
- - You contest the accuracy of your personal data. In this case, the restriction shall apply for the period of time necessary to allow the controller to verify the accuracy of those personal data;
- - The period of time during which the personal data are unlawfully processed is limited to the time necessary for the controller to verify the accuracy of the personal data;
- - the controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;
- - you have objected to the processing. In this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller prevail over your legitimate grounds.

- **Your right to the portability of your personal data**

Based on this right, you have the right to receive personal data concerning you which you have provided to a controller in a structured, commonly used, machine-readable format and the right to transmit such personal data to another controller without hindrance from the controller to which you have provided the personal data. You may exercise this right where the processing is based on consent, or a contract and the processing is carried out by automated means.

- **Your right to object to the processing of your personal data**

You have the right to object at any time, on grounds relating to your situation, to the processing of your personal data where the processing of your personal data is carried out for the purposes of the legitimate interests of the controller or on grounds of public authority. If the processing of personal data is carried out for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for these purposes.

5. The rights of the Data subject - complaints

The Data Subject shall have the right to lodge a complaint with the Authority or to bring a civil action directly before a competent court against the Controller in relation to or in respect of the processing.

The contact details of the Authority can be found on the Authority's website at www.naih.hu; the short contact details of the Authority are: telephone +36/1-391-14-00 and +36/1-391-14-10 and +36/30-683-5969 and +36/30-549-6838; e-mail address: ugyfelszolgalat@naih.hu; registered office: 1055 Budapest, Falk Miksa utca 9-11; postal address: 1363 Budapest, Pf. 9; office gate: short name: NAIH; KR ID: 429616918.

The Data Subject may institute civil proceedings against the Data Controller by applying the provisions of Act CXXX of 2016 on Civil Procedure, with the exception that the case shall be subject to the jurisdiction of a court, the jurisdiction being determined either by the place of residence (or domicile) of the Data Subject or by the seat of the Data Controller, and the court shall act in an extrajudicial manner in the settlement of the claim.

However, before lodging a complaint with the Authority or bringing any civil action, it may be useful for the Data Subject to make his or her grievance directly to the Data Controller by sending an informal request to any of the contact details of the Data Controller as set out in this Notice or to any of the contact details of the Data Protection Officer. In such a case, the Data Controller shall contact the Data Subject directly, as soon as circumstances permit, in order to resolve the situation as soon as possible and on the basis of the consensus of the parties.

6. Miscellaneous provisions.

Details of the Data Controller's use of cookies are available in a pop-up window on the Website.

The Data Controller reserves the right to unilaterally amend this Policy at any time during the period of processing, within the limits of the law. The Data Controller shall publish any such modification on the Website and the modification shall not be retroactive.

The Data Controller shall also be at the disposal of the data subject in the event that the data subject has any questions or comments regarding the processing, given that the processing in accordance with the principles and detailed rules detailed above is of particular importance to the Data Controller, as the personal data of the Data Subject are of value to the Data Controller.

The mainly relevant underlying legal material of this Notice can be found at the following addresses:

GDPR: <https://eur-lex.europa.eu/legal-content/HU/TXT/HTML/?uri=CELEX:32016R0679&from=HU>

Infotv: <https://net.jogtar.hu/jogszabaly?docid=a1100112.tv>

Finally, the Data Controller thanks the Data Subject for his/her time and attention in reading present Policy and sincerely trusts that the Notice has been useful and that the data processing process has been made clear and transparent to the Data Subject.

Budapest, 01 August 2022.

**Mezna For You Kft.
Data Controller**