

PRIVACY POLICY

"Notice"

1 Preamble

Veszprém-Balaton 2023 Zrt. appreciates your visit to our website. Data protection and data security are of utmost importance to us.

Veszprém-Balaton 2023 Zrt., in accordance with Article 12(1) of Regulation 2016/679 of the European Parliament and Council (EU) (General Data Protection Regulation, GDPR) 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, hereby informs you about the processing of personal data related to the website <https://planetlens.hu/> (hereinafter referred to as the "Website").

2 Data Controller's Name and Contact Details

Company name:	Veszprém-Balaton 2023 Zrt.
Registered address:	8 Cserhát ltp. 8, Veszprém 8200
Represented by:	Aliz Markovits, CEO
Website:	https://planetlens.hu/
E-mail:	info@planetlens.hu
Data protection contact:	adatvedelem@veszprembalaton2023.hu

Hereinafter referred to as "VEB2023" or "Data Controller".

3 Specific Data Processing Activities

3.1 NEWSLETTER SUBSCRIPTION

On the Website, you have the option to subscribe to newsletters related to the topics and events featured on the Website.

Processed Data	Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
Your e-mail address	Sending newsletters to subscribers	The legal basis for data processing is Article 6(1)(a) of the GDPR, the consent of the data subject	Until you withdraw your consent or unsubscribe

Persons authorised to access the data: Employees responsible for projects related to the Website at the Data Controller.

Data Processor: To store data collected during newsletter subscriptions and to send newsletters, VEB2023 uses the database of the following company, which qualifies as a data processor. The data is stored on the data processor's servers.

Data Processor details: MailerLite Limited (registered office: 88 Harcourt Street, Dublin 2, D02 DK18 Ireland).

3.2 ENQUIRIES

You have the option to contact the Data Controller via e-mail through the Website.

Processed Data	Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
Your name, e-mail address, content of the e-mail	Ensuring communication, responding to possible enquiries; legal claims enforcement if the e-mail content is related to this	The legal basis for data processing is Article 6(1)(f) of the GDPR, the legitimate interest of the Data Controller	Five years from receipt of the enquiry

Persons authorised to access the data: Employees responsible for projects related to the Website at the Data Controller.

Data Processor: For electronic correspondence, VEB2023 uses the cloud-based service of the Website operator's hosting provider, which qualifies as a data processor. The data is stored on the data processor's servers.

Data Processor details: Rackhost Zrt. (registered office: 41 Tisza Lajos körút, Szeged 6722).

3.3 OTHER DATA PROCESSING ACTIVITIES

Entry to competitions:

Please note that data processing related to entries and registrations for competitions announced through the Website is not covered by this Notice. Please carefully read the specific data processing notices applicable to such competitions.

Cookies:

Please also note that the Website uses cookies. You can find the specific notice on cookies in the footer of the Website.

Processing of personal data of persons under the age of 16:

Personal data of persons under the age of 16 may only be processed with the consent of an adult exercising parental responsibility over them. The Data Controller is not in a position to verify the entitlement of the consenting person or the content of their declaration; therefore, the user and the adult exercising parental responsibility guarantee that the consent complies with the legal requirements. In the absence of a declaration of consent, the Data Controller does not collect personal data from persons under the age of 16. If we become aware that we have collected personal data from a child under the age of 16, we will take the necessary steps to delete such data as soon as possible.

Processing of special categories of data:

The Data Controller does not process special categories of data within the framework of this data processing.

Automated decision-making, profiling:

No automated decision-making or profiling takes place during our data processing activities.

4.1 RIGHTS OF DATA SUBJECTS IN RELATION TO THIS DATA PROCESSING

4.1.1.1 **Right of Access**

Under Article 15 of the GDPR, you are entitled to request information at any time regarding whether and how your personal data is processed by the Data Controller. This includes details such as the purposes of data processing, the recipients with whom your data has been shared, the source of the data received by the Data Controller, the retention period, and any rights you have concerning data processing. Additionally, if the data is transferred to a third country or an international organisation, you have the right to be informed about the related safeguards. When exercising the right of access, you are also entitled to request a copy of the data. If your right of access adversely affects the rights and freedoms of others, particularly their trade secrets or intellectual property, the Data Controller is entitled to refuse your request to a necessary and proportionate extent. If your request is excessive or manifestly unfounded, the Data Controller may charge a reasonable fee under Article 12(5)(a) of the GDPR or refuse to act on the request under Article 12(5)(b) of the GDPR.

4.2.1.2 **Right to Rectification**

Under Article 16 of the GDPR, the Data Controller will rectify or supplement any inaccurate or incomplete personal data relating to you upon your request. If there is doubt about the corrected data, the Data Controller may ask you to provide appropriate proof - primarily in the form of official documentation - confirming the accuracy of the updated information.

4.3.1.3 **Right to Erasure (“Right to be Forgotten”)**

Under Article 17 of the GDPR, if you request the deletion of your personal data, the Data Controller will delete it without undue delay if:

- It is no longer required for the purpose for which it was originally stored, or the processing is unlawful;
- You withdraw your consent, and the Data Controller has no overriding legitimate grounds for processing the data.

Personal data cannot be erased if processing is necessary:

- To exercise the right to freedom of expression and information;

- To comply with a legal obligation under EU or Member State law applicable to the Data Controller;
- For the establishment, exercise, or defence of legal claims.

4.4.1.4 **Right to Restrict Processing**

You may request the restriction of processing of your personal data under Article 18 of the GDPR in the following cases:

- The processing is unlawful, but you oppose the erasure of the data and instead request the restriction of its use;
- The Data Controller no longer needs the personal data for processing purposes, but you require it for the establishment, exercise, or defence of legal claims.

4.5.1.5 **Right to Data Portability**

Under Article 20 of the GDPR, you have the right to receive the personal data concerning you, which you have provided to the Data Controller, and to request the direct transmission of such data to another data controller, provided that the processing is based on your consent.

4.6.1.6 **Right to Lodge a Complaint and Seek Legal Remedies**

If you believe that the processing of your personal data by the Data Controller violates applicable data protection laws, particularly the GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary, complaints may be submitted to the National Authority for Data Protection and Freedom of Information ("NAIH").

NAIH Contact Details:

Website: <http://naih.hu/>

Postal Address: Budapest 1363 P.O. Box 9

Address: 9-11 Falk Miksa utca, Budapest 1055

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Additionally, under the GDPR and the Hungarian Information Act, you may seek legal redress through the courts. Your rights and legal remedies are detailed in Chapters III and VIII of the GDPR

and Sections 14-23 of the Information Act (Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information).

4.7.1.7 **Response Time for Data Subject Requests**

The Data Controller ensures that if you exercise any of your rights related to this data processing and contact the Data Controller, a response will be provided without undue delay, but no later than 30 days from the receipt of your request.

If you wish to exercise any of your rights or have any questions or comments, please contact us using the details provided in Section 2 of this Notice.

Effective: 5th March 2025