

# Data Protection Policy

## 1 Purpose of the Data Protection Policy

Aviv Travel-Trade 2000 Kft (hereinafter referred to as provider, data controller) as a data controller agrees to the content of this legal notice. Commits you to ensure that all data management related to your business complies with the requirements of this Code and the applicable national legislation and the legal acts of the European Union.

Data privacy policies related to the data management of Aviv Travel-Trade 2000 Kft are permanently available at [http://wlrp.eu/data-protection/Aviv\\_Travel\\_Data\\_Protection\\_Policy\\_EN.pdf](http://wlrp.eu/data-protection/Aviv_Travel_Data_Protection_Policy_EN.pdf)

Aviv Travel-Trade 2000 Kft reserves the right to change this information at any time. Of course, you will notify your audience in due time of any changes.

If you have any questions about this announcement, please write to us and our colleague will answer your question.

Aviv Travel-Trade 2000 Kft is committed to protecting the privacy of its clients' privacy information in order to protect the privacy of their clients and partners. Aviv Travel-Trade 2000 Kft treats personal information confidentially and will take all security, technical and organizational measures that guarantee the security of your data.

Aviv Travel-Trade 2000 Kft describes their data management practices below.

## 2 Data Controller information

If you would contact our company, you can contact the data administrator at the following contact details.

Aviv Travel-Trade 2000 Kft will delete all emails that you have received, including personal data, after a maximum of 3 years from the date of disclosure.

Name: Aviv Travel-Trade 2000 Kft

Seat: 1072 Budapest, Akácfa utca 47.Registration Number: 01 09 706063

Court of Registration: Fővárosi Törvényszék Cégbírósága

Tax Number: 12841756-2-42

Phone Number: +36 1 462 0477

E-mail: [aviv@aviv.hu](mailto:aviv@aviv.hu)

## 3 Scope of handled data

### 3.1 Personal data collected upon registration

Aviv Travel-Trade 2000 Kft does not provide a registration option for users.

### 3.2 Technical details

Aviv Travel-Trade 2000 Kft selects and manages the IT tools used to handle personal data in the provision of the service so that the data treated is:

- (available) to those entitled to it;
- credibility and authentication (credibility of data management);
- its integrity can be verified (data integrity);
- unauthorized access (confidentiality of data).

Aviv Travel-Trade 2000 Kft protects your data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction.

Aviv Travel-Trade 2000 Kft provides technical, organizational and organizational measures to protect the security of data management that provides a level of protection that meets the risks associated with data management.

Aviv Travel-Trade 2000 Kft keeps it under data management

- the secrecy: it protects the information so that it can only access the person who is entitled to it;
- integrity: it protects the accuracy and completeness of the information and processing method;
- Availability: Ensure that when the eligible user needs it, you really have access to the information you need and have the tools available to you.

## 3.3 Cookies

### 3.3.1 The role of Cookies

- collecting information about visitors and their assets;
- note the custom settings for visitors that may be used (e.g. when using online transactions, so you do not have to type them again);
- facilitate the use of the website;
- quality user experience.

For a tailor-made service, the user's computer has a small data packet, place a cookie and read it later. If your browser returns a previously saved cookie, the cookie operator can link the user's current visit with the past, but only for their own content.

### 3.3.2 Essential session cookies

The purpose of these cookies is to allow the visitors to browse Aviv Travel-Trade 2000 Kft website in full and smooth manner, to use its features and the services available there. The duration of this type of cookie expires until the session (browsing) ends, and by closing the browser, this type of cookies is automatically deleted from the computer or other device used for browsing.

### 3.3.3 Third-party cookies

You use Google Analytics as a third-party cookie on Aviv Travel-Trade 2000 Kft website. Using Google Analytics for statistical purposes, Aviv Travel-Trade 2000 Kft collects information about how visitors use your web site. The data is used to improve the site's development and user experience. These cookies will remain on your browser or other browser on your computer or on your browser, or until your visitor cancels them.

## 3.4 Personal data collected during online purchase

Upon online purchase, the customer's name, email address, phone number, IP address and the date of the purchase are collected.

## 3.5 Personal data collected during customer service interactions

Upon contacting customer service, the customer's name, email address and phone number are collected.

## 4 Use and retention period of collected data

Data collection designation	Data use	Retention period
Full name	Identity verification	36 months
Email address	Contact	36 months
Phone number	Contact	36 months
IP address	Fraud prevention	36 months
Purchase date	Purchase ordering	36 months

## 5 The purpose, method and legal basis of data management

### 5.1 General Data Management Policies

The data management of the activity of Aviv Travel-Trade 2000 Kft is based on a voluntary contribution or a statutory mandate. In the case of data management based on voluntary contributions, the data subjects may withdraw their consent at any time during the processing of data.

In some cases, the management, storage, and transmission of a particular set of data are mandatory by law 4, which will be specifically notified to our customers.

We would like to draw the attention of the information to Aviv Travel-Trade 2000 Kft that, if they do not provide their personal data, the data supplier is obliged to obtain the consent of the person concerned.

The data management principles are in line with existing data protection legislation, in particular:

- 2011 CXII. Act on Information Self-Destruction and Freedom of Information (Infotv.);
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation (EC) No 95/46 / (General Data Protection Regulation, GDPR);
- Act V of 2013 - Civil Code (Civil Code);
- Act C of 2000 on Accounting (Accounting);
- LIII. Law on the Prevention and Control of Money Laundering and Terrorist Financing (Pmt.);
- 2013 CCXXXVII. Act on Credit Institutions and Financial Enterprises (Hpt.).

## 6 Physical storage of data

Your personal information (that is, the data that may be associated with you) can be treated in the following way: on the one hand, technical data on your computer, browser, web address, visited pages, on the other hand, you may also provide your name, contact details or other information if you intend to contact us personally using this site.

Technically captured data during the operation of the system: the data of the computer of the person concerned generated during the voting and which Aviv Travel-Trade 2000 Kft system records as an automatic result of the technical processes. Data that is automatically recorded will be logged automatically when entering or exiting, without the particular statement or action of the person

concerned. This data can not be linked to other personal user data except in cases that are legally binding. Only Aviv Travel-Trade 2000 Kft has access to this data.

## 7 Data transmission, data retrieval, the circle of people familiar with the data

### **WLRP Kft**

Name: WLRP Kft.

Seat: 1027, Budapest, Margit krt. 62. Registration Number: 01-09-174066

Court of Registration: Fővárosi Törvényszék Cégbírósága

Tax Number: 24376949-1-41

Phone Number: +36 30 861-2424

E-mail: dev@wlrp.eu

### **AVIV Travel-Trade 2000 Kft**

Name: Aviv Travel-Trade 2000 Kft

Seat: 1072 Budapest, Akácfa utca 47. Registration Number: 01 09 706063

Court of Registration: Fővárosi Törvényszék Cégbírósága

Tax Number: 12841756-2-42

Phone Number: +36 1 462 0477

E-mail: aviv@aviv.hu

### **InDe Team Kft**

Name: InDe Team Kft

Seat: 1073 Budapest, Erzsébet körút 58.szt.

Registration Number: 01 09 287158

Court of Registration: Fővárosi Törvényszék Cégbírósága

Tax Number: 25751033242

Phone Number: +36 30 861-2424

E-mail: info@pedalbar.hu

## 8 Customers' rights and forums of enforcement

You may request the information concerned to handle your personal data and may request the rectification of your personal data or, with the exception of mandatory data, cancellation, revocation, discretion and right of protest as indicated in the record and the above mentioned contact details of the data controller.

### 8.1 Right to be informed

Aviv Travel-Trade 2000 Kft shall take appropriate measures to ensure that all information relating to the processing of personal data referred to in Articles 13 and 14 of the GDPR and to Articles 15 to 22, and Article 34, in a concise, transparent, comprehensible and easily accessible form, in a clear and unambiguous manner.

## 8.2 Right to access

The data subject is entitled to receive feedback from the data controller as to whether his or her personal data is being processed and, if such data is being processed, has access to personal data and the following information: the purpose of data management; the categories of personal data concerned; the categories of recipients or recipients with whom they have been or have been subjected to personal data, including recipients from third countries or international organizations; the intended duration of the storage of personal data; the right to file a correction, cancellation or retention of data, the right to file a complaint addressed to the supervisor; data sources; the fact of automated decision making, including profiling, as well as the logic used and the understandable information on the significance of such data management and the likely consequences for the data subject. The data controller shall provide the information within a maximum of one month from the submission of the application.

## 8.3 Right to rectify

The person concerned may request the rectification of inaccurate personal data handled by Aviv Travel-Trade 2000 Kft and the completion of incomplete data.

## 8.4 Right to delete

In the event of any of the following reasons, the person concerned has the right, upon request, to delete the personal data relating to him, without undue delay, to Aviv Travel-Trade 2000 Kft:

- personal data is no longer needed for the purpose for which they have been collected or otherwise handled;
- it has touched the consent of the basic mapper of the data management and has no other legal basis for the data management;
- the person concerned protests the data handling and has no prior legitimate reason for data handling;
- the personal data was unlawfully handled;
- the personal data should be deleted for the legal obligation provided for by the law applicable to the data controller in the Union or the Member States;
- the collection of personal data was made with the provision of information society services.

Deletion of data can not be initiated if data management is required: to exercise the right to freedom of opinion and the right of access; the fulfillment of an obligation under EU or Member State law applicable to the data controller for the processing of personal data, or for the performance of a task carried out in the exercise of public authority exercised in the public interest or on the data controller; for the purpose of archiving, scientific and historical research or for statistical purposes in the public health field, in the public interest; or for the submission, validation or protection of legal claims.

## 8.5 Right to restrict data management

At the request of the person concerned, Aviv Travel-Trade 2000 Kft limits the processing of data if one of the following conditions is met:

- the person concerned disputes the accuracy of the personal data; in this case, the restriction concerns the period of time that allows the accuracy of personal data to be verified;

- Protestant protested against data manipulation; in this case, the restriction applies to the duration of determining whether the data controller's legitimate reasons prevail over the legitimate grounds of the party concerned.

If data processing is restricted, personal data may be handled only with the consent of the person concerned or the submission, enforcement or enforcement of legal claims or the protection of the rights of a natural or legal person, or in the public interest of the Union or of a Member State .

## 8.6 Right to data portability

The data subject shall have the right to receive the personal data that he or she has accessed to the data controller in a fragmented, widely used machine-readable format and transmit such data to another data controller.

## 8.7 Right to protest

The person concerned is entitled to object at any time to the processing of data necessary for the execution of a task performed in the public interest or in the exercise of a public authority exercised on the data controller for the purposes of his or her own personal situation or for the treatment of the legitimate interests of the data controller or a third party, including profiling based on those provisions too. In the event of a protest, the data controller may not process personal data unless it is justified by compelling reasons of lawfulness that prevail over the interests, rights and freedoms of the person concerned, or which relate to the submission, enforcement or defense of legal claims.

## 8.8 Automated decision-making in individual cases, including profiling

The data subject shall be entitled to exclude the scope of a decision based solely on automated data management, including profiling, which would have a bearing on him or would have a significant effect on them.

## 8.9 Right to withdrawal

The person concerned has the right to withdraw his consent at any time.

## 8.10 Right to court

In case of breach of his or her rights, the data subject may turn to the court. The court proceeds out of court.

## 8.11 Privacy Policy Procedures

Complaint with the National Data Protection and Information Authority can be used:

Name: National Data Protection and Freedom Authority

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22 / C. Postal address: 1530 Budapest, Pf .: 5.

Phone: 0613911400 Fax: 0613911410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

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

## 9 Other provisions

Data management not listed in this information is provided when data is included.

We inform our clients that information, dissemination, transfer of documents or other documents from other bodies, based on the authority of the court, the prosecutor, the investigating authority, the offense authority, the administrative authority, the National Data Protection and Information Authority, the National Bank of Hungary, to access the data controller.

Aviv Travel-Trade 2000 Kft for the authorities - provided the authority has indicated the exact purpose and the scope of the data - issues personal data only to the extent that it is indispensable to achieve the purpose of the search.