

Stringbike Kft.

Privacy Notice

Effective date: 15 May 2021.

The Controller

Name of controller: Stringbike Kft. (hereinafter as: „Stringbike” or „Controller”)
Registered seat: 3561 Felsőzsolca, Bódva út 7.
Branch: 1211 Budapest, Duna lejáró 7.
Email: szebenyi@stringbike.com

1. Introduction

Stringbike expresses its consent to be bound by this Privacy Notice. Stringbike also undertakes and states and declares that all processing in connection with his activities comply with the requirements laid down in this Notice and the legislation in force.

Contact details of the data protection officer:

name: Dr. Tamás Pfişter
e-mail: dpo@stringbike.com
telephone number: + 36 20 236 53 26

The Privacy Notice on Stringbike's processing is available via this link www.stringbike.com/adatvedelem.

Stringbike reserves the right to change this Privacy Notice at any time. Incidental changes are communicated to client in due course.

Should our users have any question on the clarity of this notice, please send us such questions and our colleagues will answer them.

In order to protect the personal data of Stringbike's committed clients and partners, Stringbike feels it is particularly important to respect clients' right of informational self-determination. Stringbike processes personal data confidentially and implements security, technical, and organizational measures to safeguard data.

In the following sections, Stringbike describes the principles of processing and introduces the expectations aimed to be adhered to by itself in its capacity as Controller. The principles of processing are in harmony with the legislation on data protection, in particular with the following laws and regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council 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' or the 'Regulation');
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act");
- Act V of 2013 on the Civil Code of Hungary;
- Act LXVI of 1992 – on Keeping Records on the Personal Data and Address of Citizens;
- Act C of 2000 on Accounting;
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services;
- Act CLV of 1997 on Consumer Protection;
- Act I of 2012 on the Labour Code;

(this list is incomplete and may change from time to time)

2. Principles applicable to the processing of personal data at Stringbike

In the interest of data subject's assertion of right on personal data, Stringbike shall respect the principles of data protection in the course of processing personal data:

- a) personal data are processed lawfully and fairly and in a manner transparent to the data subject;
- b) personal data are collected and used for clearly determined, legitimate purposes;
- c) Processing data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (principle of data minimisation)
- d) 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;
- e) personal data are 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, and thus ensures limited storage;
- f) in line with the principles of integrity and confidentiality, personal data are 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;
- g) personal data are processed in line with the principle of accountability in a manner to be able to demonstrate compliance with the above principles.

This Privacy Notice shall be compliant with the principle of transparent processing.

3. Scope of personal data, and purpose, basis, and duration of processing

Stringbike shall process its activity on the legal basis and for the purposes specified for each processing. Some processings are not included in this general notice, and are guided in the relevant specific notice pertaining to the processing concerned available for the data subject to get an insight upon consumption of service.

If you disclose data to Stringbike, please be advised that if you do not disclose your own personal data, then you are obliged to inform data subject and obtain his or her consent to transfer data subject's data to Stringbike, and to obtain authorization on giving such consent on behalf of data subject.

3.1. Lost and Found Register

Purpose of processing: keep a register of lost and found items found in the premises of Stringbike and inform the owner or the person finding such items.

Legal basis for processing: compliance with legal liability (Article 5:54 in the Act V of 2013 on the Civil Code of Hungary)

Scope of processed data: date and place of item found, name and contact details of person which found the item, data of the found item.

Duration of processing: one year.

3.2. Customer correspondence at Stringbike

Purpose of processing: communication with regard to consumption of Stringbike's services or other matters, in particular customer complaint management.

Legal basis for processing: compliance with legal liability (Article 17/A in the Act CLV of 1997 on consumer protection)

Scope of processed data: name, contact details, the content of customer's letter

Duration of processing: three years.

Stringbike shall add a registration number to any printed or electronic correspondence received from customers.

Data of visitors at www.stringbike.com

Purpose of processing: During visitor's visit to the website, service provider records visitors' data in order to check the functioning of services rendered, to customize services, and prevent fraud.

Legal basis for processing: controller's legitimate interest [point f in Article 6(1) in GDPR].

Scope of processed data: date, time, IP address operating system, type of browser of visitor's device, address of site visited.

Duration of processing: 30 days after the visit to the website

The Company operates the website and provides for the required online hosting capacities.

3.3. Cookie management at www.stringbike.com

To offer improved personalized services, website operator places and reads a small text file called 'cookie' on user's device. When the browser resends a cookie received and saved in a previous request, the service provider managing the cookies has the right to link user's current visit with previous ones, but only in respect of its own content.

Purposes of processing:

- *functional cookies:*
identify, authenticate, and distinguish, identify current session of users, store data entered during such session, and prevent loss of data
- *analytical cookies*
 - _ga:* A cookie installed by Google Analytics. This cookie analyses visitor, session, and campaign data, and tracks usage of site to create a site analysis report. This cookie assigns a randomly generated ID number to individual visitor for identification.
 - _gat:* A cookie used by Google Analytics. The samples in the name contain a randomly generated ID number related to the user account or the website.
 - _gid:* A cookie installed by Google Analytics. This cookie stores information on how users use the website and helps to create report on the usage of the website. The collected data include number of visitors, the source where visitors land from, and sizes visited.

Legal basis for processing: controller has legitimate interest in the proper functioning, identifying users, and prevent frauds [point f) in Article 6(1) in GDPR], and data subject's consent for analytical cookies [point a) in Article 6(1) in GDPR].

Type of processed personal data: ID number, date, time.

Duration of processing:

- until session is expired (PHPSESSID),
- one day (_gat, _gid),
- two years (_ga).

Cookies valid until session expiry remains stored on the device when the browser is closed.

Permanent cookies (with defined expiry time) remain stored on the device until they are deleted but until the maturity of expiry time at the latest.

Data subject's right to object: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (f) of Article 6(1). The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims

The users can delete a cookie from his or her device or disable it in the browser. Usually, cookies can be set at 'cookie' menu item in the Privacy settings in the Devices/Settings menu of the device.

The company operates the website and provides the related online hosting services.

3.5. Stringbike request for consent for marketing purposes, subscription to newsletter

Consent may be given to receive marketing contents and newsletter in the heading "Business authorization" found on some Stringbike forms.

Purpose of processing: to send marketing messages also containing business advertisement to the contact details provided.

Legal basis for processing: data subject's consent under point a) in Article 6(1) in GDPR.

Type of processed personal data: ID number, date, time, name, contact details, and consent to receive direct marketing requests.

Duration of processing:

- until user's consent is withdrawn, but not longer than
- 60 months after last data update by user.

The withdrawal of consent given on the receipt of direct marketing messages and erasure of personal data may be claimed by sending a request to any of the following contact details:

- via e-mail: dpo@stringbike.com , and
- by mail to: 3561 Felsőzsolca, Bódva út 7.

Data subject's right to object: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data for direct marketing purposes. The controller shall no longer process the personal data.

Possible consequences of failure to provide such data: data subject cannot be notified on the information in Stringbike's mails.

3.6. Stringbike newsletter

We request your data to send you email also containing business advertisement and direct marketing (e.g. newsletters and eDM) on our products and services.

3.7. Application for job

Purpose of processing: the process of application for a job at Stringbike, selection, including personal or online job interviews, and for communication.

Legal basis for processing: consent given by data subject.

Type of processed personal data: curriculum vitae and applications (including personal data) sent by applicants, and personal and online interview and other information recorded during such interviews.

Deadline of data erasure: one year after the submission of application.

3.8. Other processing

We give information on processings not listed in this notice upon collection of data.

You are informed that following an authorization by the court, the public prosecution, the investigating authority, the infringement authority, the administration authority, the National Authority for Data Protection and Freedom of Information, and by law, other organisations may seek the controller to provide information, supply, transfer, disclose, and hand over documents.

Provided the authority has specified the exact purpose and scope of data, Stringbike shall provide the authorities with personal data to an extent and to a scope which is essential to reach the goal of the request.

4. Mode of storage of personal data, security of processing

The Stringbike place of reservation of data and computers systems is on the servers of Tárhely.Eu Kft. (Cg. 01-09-909968). Physical location of servers: 1132 Budapest, Victor Hugo utca 18-22. Any additional preservation is provided by the sub-processor: Freemium Kft. (01-09-947347) server hotel.

Stringbike shall choose and operate the computer systems used in the course of its services to process personal data in a manner that the processed data

- a) are available for those who are authorized to access (availability);
- b) 's authenticity and attestation are ensured (authenticity of processing);
- c) 's integrity is justified (data integrity);
- d) is protected against unauthorized access (confidentiality of data).

Stringbike shall take appropriate measures to protect data, in particular from unauthorized access, change, transfer, disclosure, erasure, or destruction, as well as prevent from accidental destruction, corruption, and from being inaccessible due to developments in the applied information technology.

To protect data managed electronically in different registers, Stringbike shall apply appropriate technical solutions to ensure that the stored data cannot be interconnected directly and assigned to a data subject unless allowed by law.

In consideration of the actual state of technological development, Stringbike shall implement technical and organisational measures to secure processing to an extent that is capable of providing protection from the risks associated with the processing.

In the course of processing, Stringbike shall preserve

- a) secrecy: protects information by allowing access only to the authorized;
- b) integrity: protects the accuracy and completeness of information and method of processing;
- c) availability: provides availability when an authorized user needs to access the required information, and provides for the necessary devices.

Stringbike's and its partners information technology system and the network of the data controller and its partners is protected against fraud, espionage, sabotage backed by computer as well as against vandalism, fire, flood, furthermore against computer viruses, computer intrusion and attacks resulting in refusal to perform. The operator ensures the protection procedures on a server as well as on an application level.

Stringbike informs the data subjects that the electronic messages transmitted through the internet, regardless of the protocol (e-mail, web, ftp, etc.), are vulnerable to such network threat which result to improper activity or disclosure, alteration of information. In order to protect from such threats the data controller shall take all reasonable precaution measures to the best of its ability. It shall observe the systems in order to record all security deviations and to be able to provide evidence in case of all security matters. In addition, the system observation enables the monitoring of the applied precaution measures' efficiency.

Controller's contact details:

Name:	Stringbike Kft.
Seat:	3561 Felsőzsolca, Bódva út 7.
Branch:	1211 Budapest, Duna lejáró 7.
Treadwe Registration Number:	05-09-027523
Court of Registration:	District Court Miskolc as Court of Registration
Tax number:	25087312-2-05
E-mail:	szebenyi@stingbike.com

5. Processor's data and contact details

Hrenko Kft. (4461 Nyírtelek, Petőfi Sándor u. 4.)	server hosting, hosting, mailing system operation
---	---

This list of processors is incomplete, and Stringbike shall reserve the right to use additional processors, of whom an individual information is disclosed upon at the latest the commencement of data processing.

6. Rights of the data subject

In the event Stringbike acts in the capacity of a processor, basically the rights of the data subject may be asserted against client's controller.

In the event Stringbike acts in the capacity of a controller, then under articles 13 to 21 in the GDPR data subject (or its duly authorized representative) shall be entitled to the followings:

Data subject shall be entitled to be provided feedback from controller whether his or her personal data are being processed or not; if such processing is in progress, then shall be entitled to receive information on the personal data as well as access to the following (otherwise disclosed in the processing information) information:

- a) purpose of processings;
- b) a description of the categories of data subject's personal data;
- c) recipients or the categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Under Article 16 in the GDPR the data subject shall have the right to obtain from the controller the rectification of inaccurate personal data concerning him or her.

At the request of the data subject Controller shall without undue delay rectify inaccurate personal data concerning the data subject. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Under Article 17 in the GDPR the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her. However, prior to submitting such request, please consider the followings:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her. Controller shall have the obligation to erase personal data without undue delay in the following cases:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing
- c) the data subject objects to the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller or by a third party, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes.
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law (Hungarian law) to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Data subject's right to erasure may be restricted only in the case of the following exceptions as listed in the GDPR; in other words, upon the existence of the above grounds, the retention of personal data may be deemed lawful if required

- a) for exercising the right of freedom of expression and information, or
- b) for compliance with a legal obligation, or
- c) for the performance of a task carried out in the public interest, or
- d) by the exercise of official authority vested in the controller, or
- e) for reasons of public interest in the area of public health,
- f) for archiving purposes in the public interest, or
- g) for scientific or historical research purposes or statistical purposes, or
- h) for the establishment, exercise or defence of legal claims.

Under Article 18 in the GDPR the data subject shall have the right to obtain from the controller restriction of processing (provisional measure) of personal data concerning him or her as follows:

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or

d) the data subject objects to the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller (or by a third party); in this case restriction shall be pending until it is verified whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under the above grounds, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Under Article 21 in the GDPR the data subject shall have the right to object to processing of personal data concerning him or her as detailed below:

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or for the purposes of the legitimate interests pursued by the controller (or by a third party), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

At the latest at the time of the first communication with the data subject, the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to

processing of personal data concerning him or her unless the processing is necessary for the performance of a task carried out for reasons of public interest

Under Article 20 in the GDPR the data subject shall have the right to portability of personal data concerning him or her as follows:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where

- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The rights to data portability shall not adversely affect the rights and freedoms of others.

Complaints:

In the event data subject has a complaint regarding Stringbike's processing, he or she may send an email dpo@stringbike.com, or send a letter to this postal address: 3561 Felsőzsolca, Bódva út 7., Hungary.

In the event Stringbike receives the complaint in connection with processing activities pursued as an other controller, then shall transfer such complaint to the controller within a reasonable period.

Right to go to court:

In the event of infringement of rights, data subject has the right to bring a legal action to the court against controller. The proceedings may be taken out at the Miskolc District Court or, at the choice of data subject, the District Court competent for the place of residence (please visit the following link for the list and contact details of District Courts: <http://birosag.hu/torvenyszekek>)

Administrative procedure at the Data protection authority:

If you do not agree with this notice or you have a question, please contact our data protection officer:

name:	Dr. Tamás Pfişter
telephone number:	+36 20 236 53 26
e-mail:	dpo@stringbike.com

If you think your rights have been injured, you may seek remedy. Send your complaint to the National Authority for Data Protection and Freedom of Information:

Seat: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf.: 9.

Telephone number: + 36 30 683 969

E-mail: ugyfelszolgalat@naih.hu

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

Budapest, 15 May 2021.