

## Bard Solutions Kft.

### WEBSITE GENERAL DATA MANAGEMENT INFORMATION

Effective: 2023.

#### Why did we create this information sheet?

As a Data Controller, Bard Solutions Kft. intends to manage personal data by respecting the rights of the Data Subjects and by fulfilling the legal obligations (especially the General Data Protection Regulation, GDPR for short). Bard Solutions Kft. also considers it important to present to the Data Subjects, in accordance with its obligations, the handling of personal data that it has come to know during its data management activities, and its most important characteristics.

#### Who manages your personal data?

Your personal data is managed by Bard Solutions Kft., contact options:

Postal address	1138 Budapest, Dunavirág utca 2-6. Tower 1. 5th em.	Web address:	bardtest.gg
E-mail address:	<a href="mailto:adatvedelem@bardtest.gg">adatvedelem@bardtest.gg</a>	Telephone number:	+36 30 466 0981

#### Management of cookies:

The website of Bard Solutions Kft. uses cookies for the purpose of operating the website, facilitating its use, monitoring activity on the website and displaying relevant offers. The detailed information about cookies appears separately when you enter the website.

#### About Cookies:

When a visitor visits our site, a small file, a so-called cookie, is placed on his computer. The name cookie refers to the same small file, which is referred to as a cookie.

#### Purposes of cookies:

- It makes our site easier to use. It records the browser settings and usage habits of our visitors.
- Information is collected, for example, about how visitors use the website, which pages on our site are visited most often

#### Strictly necessary (indispensable) cookies for operation:

These cookies are essential for the use of the website and enable the use of the basic functions of the website. In the absence of these, many functions of the site will not be available to you.

The legal basis for Data Management is the legitimate interest of the Data Controller (GDPR Article 6 (1) f)).

#### Cookies for improving the user experience (settings):

These cookies collect information about the user's use of the website, for example, which pages he visits most often or what error message he receives from the website. Cookies do not collect information that identifies the visitor, that is, they work with completely general, anonymous information. The data obtained from these are used to improve the performance of the website.

The legal basis for Data Management is the Data Subject's consent (GDPR Article 6 (1) a)).

#### **Cookies for statistical purposes:**

By collecting and reporting data in an anonymous form, statistical cookies help the website owner understand how visitors interact with the website.

The legal basis for Data Management is the Data Subject's consent (GDPR Article 6 (1) a)).

#### **Marketing cookies:**

Marketing cookies are used to track visitors' website activity. The goal is to serve relevant ads to individual users and encourage them to engage, which makes our website more valuable to content publishers and third-party advertisers.

The legal basis for Data Management is the Data Subject's consent (GDPR Article 6 (1) a)).

If you do not accept the use of cookies, certain functions will not be available to you.

You can find more information about this at the following links:

Internet Explorer:<https://support.microsoft.com/hu-hu/windows/cookie-kt%C3%B6r%C3%A9se-%C3%A9s-kezel%C3%A9se-168dab11-0753-043d-7c16-ed5947fc64d#ie = 11 BC>

Edge:<https://support.microsoft.com/hu-hu/microsoft-edge/cookie-kt%C3%B6r%C3%A9se-in-a-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

Firefox:<https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalnak-tarolnak-szami>

Chrome:<https://support.google.com/chrome/answer/95647?hl=en>

Safari:<https://support.apple.com/hu-hu/HT201265>

Opera:<https://www.opera.com/use-cases/clean-browser-and-remove-trackers>

While browsing the website, technical information is also recorded (for example, in the form of log files, which contain the user's IP address, the time of the page visit, the URL address of the page(s) visited), which cannot be used for personal identification, but serve statistical purposes.

#### **Whose data do we manage?**

The DATA MANAGER manages the data of visitors to the website. (bardtest.gg)

#### **Basic data of data management:**

##### **1. Data management of the Data Controller's website - Indispensable cookies**

<b>Its goal:</b>	Ensuring the basic functioning of the website.
<b>Legal basis:</b>	GDPR Article 6 (1) f) Necessary to enforce the legitimate interest of the data controller or a third party

<b>Character:</b>	Automated	
<b>Data processed:</b>	Data managed by cookies on the website, detailed in the cookie information pop-up window.	
<b>Duration:</b>	Detailed in the cookie information pop-up window.	
<b>Scope of stakeholders:</b>	Natural persons visiting the website	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
	Name: Tárhely.Eu Szolgáltató Kft. Company registration number: 01-09-909968 Mailing address: 1538 Budapest, Pf.: 510. Email: support@tarhely.eu  Name: Cloudflare, Inc. Address: 101 Townsend St., San Francisco, CA 94107 Email: privacyquestions@cloudflare.com	Hosting provider
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Enforceable stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to protest	

## 2. Data management of the Data Controller's website - Settings cookies

<b>Its goal:</b>	Management of website user settings.	
<b>Legal basis:</b>	GDPR Article 6 (1) a) It is based on the data subject's consent.	
<b>Character:</b>	Automated	
<b>Data processed:</b>	Data managed by cookies on the website, detailed in the cookie information pop-up window.	
<b>Duration:</b>	Detailed in the cookie information pop-up window.	
<b>Scope of stakeholders:</b>	Natural persons visiting the website	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
		Hosting provider
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to data portability	

## 3. Data management of the Data Controller's website - Statistical cookies

<b>Its goal:</b>	Users' use of the website, interactions, website development	
<b>Legal basis:</b>	GDPR Article 6 (1) a) It is based on the data subject's consent.	
<b>Character:</b>	Automated	
<b>Data processed:</b>	Data managed by cookies on the website, detailed in the cookie information pop-up window.	
<b>Duration:</b>	Detailed in the cookie information pop-up window.	

<b>Scope of stakeholders:</b>	Natural persons visiting the website	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
		Hosting provider
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to data portability	

#### 4. Data management of the Data Controller's website - Marketing cookies

<b>Its goal:</b>	Tracking website activity of visitors. Displaying advertisements	
<b>Legal basis:</b>	GDPR Article 6 (1) a) It is based on the data subject's consent.	
<b>Character:</b>	Automated	
<b>Data processed:</b>	Data managed by cookies on the website, detailed in the cookie information pop-up window.	
<b>Duration:</b>	Detailed in the cookie information pop-up window.	
<b>Scope of stakeholders:</b>	Natural persons visiting the website	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
		Hosting provider
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to data portability	

#### 5. Data management of the Data Controller's website - Unclassified cookies

<b>Its goal:</b>	Unclassified cookies are cookies that are still being classified, together with individual cookie providers.	
<b>Legal basis:</b>	GDPR Article 6 (1) a) It is based on the data subject's consent.	
<b>Character:</b>	Automated	
<b>Data processed:</b>	Data managed by cookies on the website, detailed in the cookie information pop-up window.	
<b>Duration:</b>	Detailed in the cookie information pop-up window.	
<b>Scope of stakeholders:</b>	Natural persons visiting the website	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
		Hosting provider
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to data portability	

#### 6. Sending a newsletter

<b>Its goal:</b>	Sending marketing newsletters to subscribers	
<b>Legal basis:</b>	GDPR Article 6 (1) a) It is based on the data subject's consent.	
<b>Character:</b>	Automated and manual	

<b>Data processed:</b>	Name, email address	
<b>Duration:</b>	Until the existence of the service or the withdrawal of the data subject's consent	
<b>Scope of stakeholders:</b>	Natural persons visiting the website	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
		Hosting provider
		Website developer
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to data portability	

### 7. Presence and marketing on social media

<b>Its goal:</b>	Marketing	
<b>Legal basis:</b>	GDPR Article 6 (1) a) It is based on the data subject's consent.	
<b>Character:</b>	Automated	
<b>Data processed:</b>	Public name, photo, e-mail address, message sent on social media, evaluation of the person visiting the Data Controller's profile page	
<b>Duration:</b>	Until deletion at the request of the data subject	
<b>Scope of stakeholders:</b>	Visitors to the website of the Data Controller.	
<b>Source of data:</b>	People visiting the website	
<b>Data processor(s):</b>	Your data:	Activity:
		Social media management
<b>Joint data controller:</b>	Meta Platforms Ireland Ltd.4 Grand Canal SquareGrand Canal HarbourDublin 2 Ireland Contacting the data protection officer: <a href="https://www.facebook.com/help/contact/540977946302970">https://www.facebook.com/help/contact/540977946302970</a>	Operator of social profiles
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction, Right to data portability	

### 8. Registration of interested parties' requests and complaints

<b>Its goal:</b>	Registration of complaints and requests related to data management, contact of the affected parties	
<b>Legal basis:</b>	GDPR Article 6 (1) c) Necessary to fulfill the data controller's legal obligations	
<b>Character:</b>	Automated and manual	
<b>Data processed:</b>	Identification data, contact data	
<b>Duration:</b>	5 years or until the conclusion of the legal dispute	
<b>Scope of stakeholders:</b>	Affected, complaining	
<b>Source of data:</b>	Affected, complaining	

<b>Data processor(s):</b>	Your data:	Activity:
	There isn't	-
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction	

### 9. Notification of a data protection incident

<b>Its goal:</b>	Information and contact regarding the occurrence of a data protection incident	
<b>Legal basis:</b>	GDPR Article 6 (1) c) Necessary to fulfill the data controller's legal obligations	
<b>Character:</b>	Automated and manual	
<b>Data processed:</b>	Identification data, contact data	
<b>Duration:</b>	5 years or until the conclusion of the legal dispute	
<b>Scope of stakeholders:</b>	Affected persons	
<b>Source of data:</b>	Affected persons	
<b>Data processor(s):</b>	Your data:	Activity:
	There isn't	-
<b>Recipient(s) of data transmission:</b>	There isn't	-
<b>Related stakeholder rights:</b>	Right to information, Right to access, Right to rectification, Right to erasure, Right to restriction	

**In the case of data processing based on consent, you can withdraw your consent at any time.**

**In the case of data processing based on the legitimate interests of the data controller, the data subject may object to the data processing.**

#### **What principles do we consider important when handling your data?**

We handle personal data based on the applicable legal regulations.

The Data Controller only processes personal data specified in the scope of individual data management.

The security of the provided personal data is protected by all necessary technical and organizational measures.

It pays particular attention to ensuring the confidentiality, integrity and availability of personal data.

The Data Controller is responsible for the veracity and accuracy of the personal data after they have been provided by you. interpreted according to the terms defined in the interpretive provisions of the Act.

#### **What rights do you have in relation to your personal data managed by the Data Controller?**

The Data Controller ensures that the Data Subjects can exercise their rights defined in the GDPR regulation. The Data Controller cannot refuse a request to exercise these rights, unless it proves that

the Data Subject cannot be identified. Therefore, the Data Subject needs to identify himself in order to fulfill his request.

The Data Controller is obliged to fulfill the request without delay, but within a maximum of 1 month from the date of receipt, and to inform the Data Subject of possible obstacles or delays in the fulfillment. In this case, the deadline can be extended by another 2 months, provided that the person concerned is informed of the extension and the reason for it within 1 month.

The Data Controller will respond to the Data Subject's request in the form in which it was received. The Data Subject has the option to submit his request electronically, in which case he will also receive the answer electronically, unless expressly provided otherwise.

In order to ensure the rights of the Data Subject, the rights contained in this information can be exercised free of charge.

If and to the extent that the requested measure or information is excessive or obviously unfounded, the Data Controller may charge a reasonable amount for fulfillment (especially to cover the increased administrative costs of excessive requests), or may refuse to take action based on the request. In such a case, the Data Controller owes the Data Subject an obligation to provide reasons.

In such a case, the Data Controller owes the Data Subject an obligation to provide reasons.

In accordance with the legislation, the Data Subjects may exercise the following rights:

a.) During the entire duration of the data management, the Data Subject is entitled to request information and access to the personal data managed by the Data Controller, as well as the characteristics of the data management, in particular:

- the identity and contact details of the Data Controller and its contact person, if the Data Controller employs a data protection officer, their contact details,
- the purpose, legal basis and duration of data management,
- the name and address of the data processor, and the activities related to data management, if a data processor is used,
- on the legal basis and recipient of data transfer, if data is transferred,
- about the data protection incident that may have occurred.

b.) The Data Subject is entitled to request the correction or change of his personal data. If your data has changed or is not accurate, the Data Controller can modify it at your request at any time during the processing of your personal data. You can request this via our contact details provided.

c.) The Data Subject may withdraw his consent at any time and request that his data be deleted by the Data Controller.

Personal data of the Data Subject in that case as well will be deleted, if the processing of the data is illegal, the purpose of the data processing has ceased, or the specified period for storing the data has expired; or the court or the National Data Protection and Freedom of Information Authority ordered it.

d.) At the Data Subject's request, the Data Controller restricts the processing of personal data:

- if the Data Subject disputes the accuracy of their data, in this case the limitation applies to the period that allows the Data Controller to check the accuracy of the personal data

- if the data management is illegal and the Data Subject opposes the deletion of their data and requests their restriction instead
- The Data Controller no longer needs the personal data for the purpose of data management, but the Data Subject requires them to present, enforce or defend his legal claim
- if the Data Subject objects to data processing, in this case the restriction applies to the period until it is determined whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the Data Subject.

e.) the Data Subject may object to the handling of his personal data if the Data Controller handles the processing of his data on the basis of the legal basis necessary to enforce his own or a third party's legitimate interests. In this case, the Data Controller may no longer process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedom of the Data Subject, or that are related to the submission, enforcement or defense of legal claims.

f.) If the data management is based on consent, or is necessary for the performance of a contract and the data management is carried out in an automated manner, i.e. the Data Subjects' data is managed using a machine register, the Data Subject has the right to have the personal data concerning him/her provided to the Data Controller segmented and widely you will receive it in a used, machine-readable format. Furthermore, they are forwarded to another Data Controller without the Data Controller hindering this. (The Data Subject's right to data portability)

### **The Data Subject's legal remedies**

In the event of a perceived violation of rights related to the handling of your personal data, you can file a complaint with the National Data Protection and Freedom of Information Authority or contact the competent court (<http://birosag.hu/torvenyszekek>).

Contact information of the National Data Protection and Freedom of Information Authority:

Address: 1055 Budapest, Falk Miksa utca 9-11. Postal address: 1363 Budapest, Pf.: 9.

Phone number: +36 1 391 1400, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)