

REGULATION OF DATA PROTECTION

VARGA TANYA Idegenforgalmi és Vendéglátó Kft.

Seat: 6041 Kerekegyháza, Kunpuszta 150.

Registry Number: 03-09-109394

VAT Number: 12739387-2-03

Issued by: Value Data Solutions Kereskedelmi és Szolgáltató Kft.

Seat: 6050 Lajosmizse, Bajcsy-Zsilinszky u. 78.

Registry Number: 03-09-131294

VAT Number: 25947539-2-03

Katalin Gizella Vincze – Data protection clerk

AIM AND SCOPE OF THE REGULATION, DEFINITION OF THE DATA MANAGER

The aim of the regulation is the basic definition of the rules concerning data management so that the data manager respects the private sphere of natural persons. Its' scope covers all data management and processing within the territory of Hungary with regard to personal data, common data or public data of common interest.

The regulation was set up according to the below effective measures:

- act CXIX of 1995 about the management of name- and address data for use in direct and indirect marketing
- act CVIII of 2001 about the electrical marketing services resp. on the informational society
- act CXII of 2011 about the right for informational autonomy and about freedom of information.
- Ordonnance 2016/679/EU (27th April 2016) personal data handling of natural persons about the protection and the free flow of such data resp. the repeal of the 95/46/EK rule.
- Constitution of Hungary
- act V of 2013 of the Book of the Civil Law
- act I. of 2012 from the Work Codex

- act C of 2012 about Punitive Law
- act C of 2003 about Electronic Communication
- act CLXV of 2013 about Claims and Announcements of Public Interest
- act XCII of 2003 about Taxation
- act L of 2013 about the electronic information safety of the state and local government organs
- act XLVIII of 2008 about the basic conditions and specific limitations of economical marketing activities
- Act of 2000 about accountancy
- act LIII of 2017 about precautions and hindrance of money laundering and financing of terrorism
- act CLI of 2017 about the order of the tax management
- act LXVI of 1995 about public documents, public archives and about the protection of the documents in private archives
- act CLXIV of 2005 about commerce
- act LXXXVIII of 2012 about market surveillance of products
- 210/2009. (IX. 29.) government decree about the conditions of commercial activities
- act C of 1990 about local taxes
- 239/2009. (X. 20.) government decree about detailed conditions of accommodation service activity and about the order of allowance issuing for accommodation services
- 62/2011. (VI. 30.) commercial ministry degree about the circulation and production of catering industry products and about safety of the circulated food
- 61/2017. (III. 20.) government decree about the tasks of the Hungarian Touristic Agency Private Limited Company concerning tourism and catering
- act XLVI of 2008 about food chain and its surveillance by the authority
- act CXIV of 1993 about animal husbandry
- 119/2007. (X. 18.) decree of the Ministry of Agriculture about the registration of the animal keeping locations, stock-farms and the data in correlation with them
- 110/2013. (IV. 9.) government decree about identification of the horse-breeds

DATA OF THE DATA MANAGER

Company name: VARGA TANYA Idegenforgalmi és Vendéglátó Kft.

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Data and contact details of the data protection specialist participating in the completion of the data protection regulation are as follows:

Value Data Solutions Kft. (6050 Lajosmizse, Bajcsy-Zsilinszky u. 78.) – Vincze Katalin Gizella
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v.datakft@gmail.com

The company VARGA TANYA Idegenforgalmi és Vendéglátó Kft.

(further: data manager) in his activities pays enhanced attention to the protection of the personal data, to the observance of the binding legal rules, to the safe and fair data handling.

Data manager manages the personal data set at his disposal by regarding the effective Hungarian and European legislation and ethical expectations, under all circumstances conducts the technical and organizational activities necessary for the safe data handling.

Data manager reserves himself the right to modify the data protection regulation. In this case, it publishes the modified regulation.

The most important principles of the present regulation:

Personal data can be managed only in case the involved party has - in case of special data - contributed to it in writing or the law resp. the ordinance of the local government ordains it - with lawful authorization and only in the specific scope.

Personal data can be managed only with specific aim, for the sake of fulfilling liability and practicing of right. The data management should - in all phases - comply with this aim.

Only those personal data can be managed that are essential for the realization of the aim of the data management, and is eligible for the achieving of the goal and only in the merit in which and as long as it is necessary for the realization of the target.

I. DEFINITIONS OF THE TARGETS OF THE DATA MANAGEMENT WITHIN THE ORGANISATION

The company VARGA TANYA Idegenforgalmi és Vendéglátó Kft. acts by considering the specifications of the present regulation while conducting its economic activity.

The main economic activities of the VARGA TANYA Idegenforgalmi és Vendéglátó Kft are as follows:

accommodation service, restaurant service, mobile catering and other catering services, real estate renting, free time activity, horse-riding service, horse-keeping, conference and commercial presentation organization, event organization, marketing activity, physical welfare services.

The present regulation rules the personal data management acquired in course of all above activities.

Data management comprises all transactions of the above process or the total of the transactions, especially the data collection, the recording, transmission, inquiring, using, publishing, harmonization or linking, blocking, deleting and annihilation of data, respectively the hindrance of the further use of the personal data, making of photos, voice and picture recording or the recording of the fitting physical characteristics enabling the identification.

In correlation with the clients, based on the law against money laundering, the main target is to give predominance to the principle of the connection to the aim of the data management. In course of copying the documents for personal identification the Enterprise in all cases issues an Acceptance Statement and informs the client about the time-scope and aim of the administration.

Data manager may approach the clients based on their contributing statement by electronic mails of economic content.

No taxation secret and other documents disclosed by the client can be disclosed to Third Party without written agreement, except for the liabilities by law.

Data manager keeps the acquired business secrets confidential and does not convey them to Third Party.

Duties of the data manager in details:

- Observance of the effective legal regulation to be applied during administration and maintenance of the data of its employees, clients, sub-contractors and guests.
- In case the launched economic coordination doesn't lead to success, data manager annihilate the personal document copies.
- Completion of the confidentiality statement, observance of the regulations concerning confidential information, written warning of the affected parties (employees, business partners, accountancy organ) of legal consequences of the breaching of the rules.
- Hindrance of the access of the employees to clients' data and accurate documentation of the physical and technical safety requirements.

The claim of the data management is the lawful interest of our company, it is based on legal regulations, fulfillment of liability stated in contract or volunteer commitment with the aim that in a mighty legal dispute can prove the contractual fulfillment. The arguments of data managements applied in the present regulation were specified on a test conduct.

For the fulfillment of the liability of the tourist tax we administrate data-supplement acc. to act C of 1990 on local taxes by considering the content of the data protection regulation.

II. SPECIFICATION OF THE DATA PROTECTION MEASURES WITHIN THE ORGANISATION, SAFETY OF DATA MANAGEMENT

Data manager protects the information especially against unauthorized access, modification, transmission, publication, deleting or annihilation, as well as against accidental destruction and damage.

Data manager ensures the safety of data together with the operator of the server by technical and organizational measures that grant adequate protection level against risks arising with regard of data management.

The involved person can grant its contribution by a written agreement with the data manager with the aim of the fulfillment of the contract's content. In this case, the contract has to contain all information that the involved person needs to know with regard to the management of his personal data, especially the specification of the managed data, the duration of the data management, the aim of management, the transfer of the data and eventual application of data processor. The contract has to contain - in an unambiguous way - that by signing the involved person contributes to the data management of his personal information according to the contract.

The right of personal data protection and the rights of the involved person can not be damaged by other interest concerning the data management, including the public interest - other than those by law.

Physical, operational and technical safety mode of data storage, sorting out, management, processing and transfer occurs according to the legislation and is documented accurately.

Journaling and administration of the above activities can be traced in the system operated by the enterprise. Deleting, correcting, blocking of the data and the administration concerning them is stated in the journaling of the programs applied by the enterprise. Private persons are informed about the right of protest. Present regulation contains the mode of identification of the involved person.

In case of data protection incident, one has to contact the system operator - after notification of the representative of the enterprise - in order to avoid further data loss. After the occurrence of the data protection incident the prior task is the notification of the involved person with involvement of the data protection clerk, the granting of information on the accurate documentation of the concrete measures taken, if possible, the arrangement of the data-saving by involving an expert.

When invoicing, the legislation orders the statement of the clients' address. In this case, Eker. 13/A.§ (2) section is the assertion of right, based on which the enterprise can manage the personal data of the person using the services in course of the invoicing of the fees of the services of the enterprise. Duration of the data management is the maintenance obligation of the accounting document supporting directly or indirectly the accountancy of 8 years

Our enterprise ensures our clients and interested people to contact us by mail. The e-mail address is an essential tool of the identification of the user. The argument of the data management is in this case is the contribution of the involved person. The contribution is based

on the a) point of the section 5. § (1) of the info-law. Data is used for this purpose until cancellation of the contribution, but at latest after one year of the last correspondence.

After this period your data will be deleted from our contact list.

After closing the electronic correspondence, our right of data management of personal data ceases to exist by fulfillment of the contract. On the other hand, in order to prove that we have fulfilled our contractual duties in case of an eventual legal dispute this system-messages can be stored until the end of the time of lapse based on the V. act („Civil Law Book.”) 6:22. § section of 2013 on the Civil Law, i.e. 5 years after the sending.

Data manager make use of the cooperation of the below server and website-operator:

"HW STÚDIÓ" Számítástechnikai Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság
(6000

Kecskemét, Petőfi Sándor utca 1. B. ép. 2. em. 1., VAT N.: 11428084-2-03)

website: www.vargatanya.hu

III. RIGHTS OF THE INVOLVED PERSONS

Data manager manages the personal data in each case based on legislation or voluntary contribution. In some cases, lacking contribution, data management can rest on other arguments of the clause GDPR 6 of the rule 2016/679 of the European Parliaments and Council.

Involved persons can require information from the data manager on the management of his personal data and can ask for the correction, deleting and blocking of his personal data - except for the obligatory data management.

On the request of the involved person, data manager informs him of the data processed by the appointed data processor, the source of the data, the aim and duration of the management , about the name and address of the data processor and its data management activity, the circumstances, effects of the data protection incident and the actions taken for its aversion, further - in case of the transmission of the personal data of the involved person - on the argument and recipients of the data transfer.

Data manager deletes the personal data, if the management is unlawful, the involved person asks for, the data is faulty or incomplete - and this state can not be corrected in a lawful way - provided the legislation does not exclude the deletion of the data; if the aim of the data management ceases to exist, if the duration of the management specified by law has expired or if the court or data protection clerk has ordered to delete it. Data manager notifies the involved person about the correction or deleting, further he notifies all those having received the data for data management earlier. The notification can be by-passed, if it doesn't harm the

rightful interest of the involved person. The user is responsible for the authenticity of the personal data.

Involved person can refuse the management of his personal data, if the management (and transfer) of the personal data is solely used for the validation of the right or lawful interest of the data manager or processor except legislation ordered the data management. If the data management and transfer is conducted with the aim of direct business acquisition, straw poll or research, law ensures the practice of the right of claiming.

Data manager - suspending the data management in the same time - has to examine the claim at latest within 15 days from the receipt of the claim and inform the applicant about the result in writing. If the claim is justified, data manager has to stop data management including the further recording and transferring of data and block the data. Further, he should inform all parties, that received the personal data of the involved person earlier, that are obliged to take measures in order to ensure the right of claim.

In case of the damage of the involved person's rights, data manager can turn to court or to data protection clerk.

IV. INTERPRETATIVE RULINGS

The data protection terms of our policy have the following meaning:

Personal data: all data connected to a natural person (identified or unidentified) (further involved person) and the consequences deriving from the data. Personal data preserves its described quality as long as its correlation with the involved person can be restored. The person can be regarded as identified, if it is possible to identify him directly or indirectly by his name or by several identification, respectively by one or more physical, physiological, mental, economical, cultural or social characteristics.

Contribution: volunteer and specific disclosing of the will of the involved person that is based on correct information and by which it unambiguously asserts its consent to whole scale or limited management of the personal data.

Protest: the statement of the involved person, by which he objects the management of his personal data and asks for the stopping of the data management and the deletion of the managed data.

Data manager: natural or legal person resp. an organization without legal personality that on its own or in cooperation with others defines the aim of the data management, takes the decisions (including the applied tools) and conducts the data management or let it conducted by the data processor.

Data management: the action or the summary of actions done to the data independently from the applied process, so especially the collection, recording, systematizing, storage, modification, use, inquiring, transfer, publication, harmonization, linking, blocking, deletion and annihilation of the data, respectively the hindrance of its further use and that of the making of photo, voice or picture record of it, respectively that of the recording of characteristics enabling the identification of the person.

Data transfer: the making available of the data to a third person.

Publishing: the making available of the data to anyone.

Deletion of the data: the making of the data recognizable so that its restoration is no more possible.

Data marking: the marking of the data for differentiation.

Data blocking: the marking of the data with identification in order to limit the further management ultimately or for a defined period.

Data annihilation: the total physical destruction of the data medium.

Data management: the conduct of the technical operations connected to data handling independently from the applied methods and tools respectively from the location of the application provided the technical operation is conducted on the data.

Data processor: natural or legal person resp. an organization without legal personality who conducts the processing of the data based on a contract - including the contracts made according the law.

Data base: the totality of data managed in one register.

Third person: natural or legal person resp. an organization without legal personality, who is not identical with the involved person, neither with the data manager nor with the data processor.

EEA-state: Member state of the European Union and other state that participates in the agreement on the European Economic Area whose citizen have the same legal status as the citizens of a European Economic Area country based on agreement between the European Economic Area and the non-participating state.

Third country: countries that are no EEA states.

Data protection incident: illegal management or processing of data, so especially the unauthorized access, modification, transfer, publishing, deletion or annihilation respectively the accidental destruction or damage.

AUTHORITIES OF SURVEILLANCE

Competent Local Court - in civil law issues

In case of data protection incidents and abuse of personal data:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: 06- 1-391-1400

Fax: 06-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: naih.hu

Lajosmizse, 2018. május 25.

Issued by: Value Data Solutions Kft. –Katalin Gizella Vincze data protection clerk