

www.cosmos.hu

Privacy Policy

I. INTRODUCTION

Cosmos Utazási Iroda Korlátolt Felelősségű Társaság (= Cosmos Travel Ltd.) (registered seat: H-1095 Budapest, Mester utca 21; national tax number: 10523258-2-43) (hereinafter referred to as the Service provider or the data controller) is bound by the following privacy policy.

We are providing the following policy in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation) of the European Parliament and of the Council 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, and repealing Directive 95/46/EC.

This privacy policy contains rules regarding the processing of data related to the following web pages:

The privacy policy can be retrieved from the following web page:

Any amendments to this policy will take effect when published on the web page indicated above.

THE CONTACT INFORMATION OF THE DATA CONTROLLER:

Legal name: Cosmos Utazási Iroda Korlátolt Felelősségű Társaság (= Cosmos Travel Ltd.) Registered seat: H-1095 Budapest, Mester utca 21

Email: info@cosmos.hu

Phone: +36 1 266 0759

II. DEFINITIONS

1. 'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2. 'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration,

retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. 'Controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

4. 'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

5. 'Recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

6. 'Consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

7. 'Personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

III. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Personal data shall be:

a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) of the General Data Protection Regulation (hereinafter GDPR), not be considered to be incompatible with the initial purposes ('purpose limitation');

c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('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 ('accuracy');

e) 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

f) 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 ('integrity and confidentiality').

The controller shall be responsible for, and be able to demonstrate compliance with, the above requirements ('accountability').

IV. PROCESSING

SENDING MESSAGES, ESTABLISHING CONTACT, REQUESTING AN OFFER

1. The fact of data collection, the scope of the data processed and the purpose of the processing:

Personal data	The purpose of the processing
Name, email address, company name	Communication, identification
The date and time of sending the message	Performing a technical operation
The IP address at the time of sending the message	Performing a technical operation

2. The data subjects: All subjects who send a message, an inquiry or an offer request through the website.

3. The duration of the processing and the deadline for erasure: The processing stops when the data subject requests erasure.

4. Data controllers to whom the data might be disclosed: Personal data might be processed by authorized associates of the data controller with regard to the above principles.

5. Rights of the data subject in connection with the processing of the data:

- The data subject has the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject; and
- the right to object to processing; as well as
- the right to data portability and to withdraw consent at any time.

6. The data subject may request the erasure or modification of personal data through the following channels:

- by post at H-1095 Budapest, Mester utca 21;
- via email at info@cosmos.hu;
- by calling +36 1 266 0759

7. The legal basis for the processing: the data subject's consent, Section (1) a) of Article 6 of the GDPR, paragraph 5(1) of the Privacy Act

8. We are hereby informing you that

- **the processing of data is based on your consent;**
- you are **obliged** to provide the personal data in order for us to be able to reply to your message;
- if you do not provide us the required data, as a **consequence**, we will not be able to comply with your request.

V. PROCESSORS ACTING ON OUR BEHALF

Hosting provider

1. Activity carried out by the data processor: Hosting.

2. The name and contact information of the data processor:

Tárhelypark Kft.
H-1122 Budapest, Gaál József út 24.
Email: info@tarhelypark.hu

3. The fact of processing, the scope of the data processed: All personal data provided by the data subject.

4. Data subjects: All subjects who use the website.

5. The purpose of the data processing: To make the website accessible and operational.

6. The duration of the processing and the deadline for erasure: The processing stops when the agreement between the data controller and the hosting provider is terminated, or when the data subject requests erasure from the hosting provider.

7. The legal basis for the processing: the user's consent, paragraph 5(1) of the Privacy Act, Section (1) a) of Article 6 of the GDPR and paragraph 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce activities and information society services.

Website maintenance provider

1. Activity carried out by the data processor: Hosting.

2. The name and contact information of the data processor:

"DX Labz", Kriston Daniel E.V.
H-3623 Borsodszentgyörgy, Horgos u. 8.
E-mail: daniel@dxlabz.com

3. The fact of processing, the scope of the data processed: All personal data provided by the data subject.

4. Data subjects: All subjects who use the website.

5. The purpose of the data processing: To make the website accessible and operational.

6. The duration of the processing and the deadline for erasure: The processing stops when the agreement between the controller and the hosting provider is terminated, or when the data subject requests erasure from the hosting provider.

7. The legal basis for the processing: the user's consent, paragraph 5(1) of the Privacy Act, Section (1) a) of Article 6 of the GDPR, paragraph 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce activities and information society services.

VI. MANAGING COOKIES

1. The fact of processing, the scope of the data processed: Unique identification number, dates and times.

2. Data subjects: All subjects who visit the website.

3. The purpose of the data processing: To identify users and track visitors.

4. The duration of the processing and the deadline for erasure:

The type of cookie used	The legal basis for the processing	The duration of the processing	The scope of the data processed
Session cookies	Paragraph 13/A(3) of Act CVIII of 2001 on certain issues of electronic commerce activities and information society services ('Act on E-Commerce')	Until the end of the visitor's session	connect.sid

5. Data controllers to whom the data might be disclosed: The controller does not process personal data by using cookies.

6. Rights of the data subject in connection with the processing of the data: Data subjects may delete cookies in the Devices/Settings menu of their browser, usually under the Privacy settings option.

7. The legal basis for the processing: It is not required to gather consent from the data subject insofar as using cookies is for the sole purpose of carrying out the transmission of a communication over an electronic communications network, or as strictly necessary in order for the provider of an information society service explicitly requested by the subscriber or user to provide the service.

OTHER COOKIES

8. The data controller uses Facebook's remarketing code, about which we would like to provide the following information: cookie lifetime: 20 days; the purpose of the processing: the personalization of Facebook ads. Learn more at <http://hu-hu.facebook.com/help/cookies/>

VII. NEWSLETTER AND DIRECT MARKETING

1. Article 6 of Act XLVIII of 2008 on the essential conditions of and certain limitations to business advertising activity states that advertisements may be communicated to users by directly contacting them at the contact information they provided during registration, if the addressees of the advertisement gave their preliminary consent, clearly and expressly, to being contacted in this way.

2. Preserving the provisions of this privacy policy, customers may also consent to the processing of their personal data by the Service provider in order to receive promotional offers.

3. The Service provider will not send unsolicited advertising messages and, without limitation or the need for justification, the user can unsubscribe – free of charge – from receiving offers. In this case, the Service provider removes all personal data from the registry and stops sending other promotional offers to the user. The user can unsubscribe from ads by clicking the link in the message.

4. The fact of data collection, the scope of the data processed and the purpose of data processing:

Personal data	The purpose of processing
Name, email address	Identification, providing an opportunity to sign up for the newsletter
The date and time of signing up	Performing a technical operation
The IP address at the time of signing up	Performing a technical operation

5. Data subjects: All subjects who sign up for the newsletter.

6. The purpose of the processing: to send electronic messages (e-mail, sms, push messages) to the data subject, provide them information about the current offers, products, discounts, new features, etc.

7. The duration of the processing and the deadline for erasure: until the consent of the user is withdrawn, i. e. when the user unsubscribes.

8. **Data controllers to whom the data might be disclosed (Recipients of personal data):** Personal data might be processed by sales and marketing associates of the data controller with regard to the above principles.

9. **Rights of the data subject in connection with the processing of the data:**

- The data subject has the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject; and
- the right to object to processing; as well as
- the right to data portability and to withdraw consent at any time.

10. **The data subject may request the access to, the erasure, the modification, the portability, the restriction of processing of personal data, and may object to processing through the following channels:**

- by post at H-1095 Budapest, Mester utca 21;
- via email at info@cosmos.hu;
- by calling +36 1 266 0759

11. The data subject **can unsubscribe free of charge** from receiving newsletters at any time.

12. **The legal basis for the processing:** the User's consent, Section (1) a) of Article 6 of the GDPR, paragraph 5(1) of the Privacy Act, and Article 6(5) of Act XLVIII of 2008 on the essential conditions of and certain limitations to business advertising activity:

Advertisers, advertising service providers and publishers of advertisement shall maintain records on the personal data of persons who provided the statement of consent to the extent specified in the statement. The data contained in the aforesaid records, relating to the target of the advertisement, may be processed only for the purpose defined in the statement of consent, until withdrawn, and may be disclosed to third persons subject to the express prior consent of the person affected.

13. We are hereby informing you that

- **the processing of data is based on your consent;**
- you are **obliged** to provide the personal data in order for us to be able to send you newsletters;
- if you do not provide us the required data, as a **consequence**, we will not be able to send you newsletters.

VIII. SOCIAL MEDIA

1. The fact of data collection, the scope of the data processed: the user's registered name on Facebook, Twitter, Instagram, etc., the user's public profile picture.
2. Data subjects: All subjects who signed up for Facebook, Twitter, Instagram, etc., and liked our website.
3. The purpose of collecting the data: To share and, through gathering likes, promote products, discounts, website content or the whole website on social media.
4. The duration of the processing, the deadline for erasure, the data controllers to whom the data might be disclosed and the rights of the data subject in connection with the processing of the data: The data subject can learn more about the sources and the processing of as well as the means and legal basis of access to the data at the site of the social medial service. The processing takes place on the site of the social media service, therefore the duration and the means of processing as well as the rights for erasure and modification are regulated by the social media site itself.
5. The legal basis for the processing: the user's consent to the processing of his or her personal data on the social media site.

IX. USING GOOGLE ANALYTICS

1. This website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site.
2. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the IP address for users of Member States of the European Union as well as other parties to the Agreement on the European Economic Area.
3. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider.
4. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

X. CUSTOMER RELATIONS AND OTHER PROCESSING

1. Should data subjects have any questions or problems while using the services of the controller, they may contact the controller at the contact details (telephone, email, social media sites, etc.) provided on the website.
2. Controller shall delete the emails and the messages it received, and the data that was provided on the phone or via Facebook, etc., including the requester's name and email address, and any other data provided to it voluntarily, not later than two years after the data was provided.
3. We will provide information on further processing not included in this privacy policy at the time when the data is collected.
4. When requested by authorities in exceptional cases, or when requested by other bodies authorized by law, the Service provider shall be required to provide information, to provide or hand over data, or to hand over documents.
5. In such cases, the Service provider shall only reveal personal data to the requester, provided that the exact purpose and the scope of the data are communicated, to the extent and scope that is essentially required to achieve the purpose of the request.

XI. RIGHTS OF THE DATA SUBJECTS

1. Right of access

You shall have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information listed in the GDPR.

2. Right to rectification

You shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning yourself. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure

You shall have the right to obtain from the controller the erasure of personal data concerning yourself without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds listed in the GDPR applies.

4. Right to be forgotten

Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you have requested the

erasure by such controllers of any links to, or copy or replication of, those personal data.

5. Right to restriction of processing

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

- the accuracy of the personal data is contested by you, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- you have objected to processing pending the verification whether the legitimate grounds of the controller override those of yours.

6. Right to data portability

You shall have the right to receive the personal data concerning yourself, which you have 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 (...)

7. Right to object

You shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning yourself which is based on point (e) or (f) of Article 6(1) of the GDPR, including profiling based on those provisions.

8. Objection to processing for direct marketing purposes

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

9. Automated individual decision-making, including profiling

You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning yourself or similarly significantly affects you.

The previous paragraph shall not apply if the decision:

- is necessary for entering into, or the performance of, a contract between you and a data controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

XII. THE TIME LIMIT FOR ACTION

The controller shall provide information on action taken on a request to you without undue delay and in any event **within one month** of receipt of the request.

That period may be **extended by two further months** where necessary. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

If the controller does not take action on your request, **the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action** and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

XIII. SECURITY OF PROCESSING

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

XIV. COMMUNICATION OF A PERSONAL DATA BREACH TO THE DATA SUBJECT

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

The communication to the data subject shall describe **in clear and plain language** the nature of the personal data breach, contain the name and contact details of the data protection officer or other contact point where more information can be obtained, describe the likely consequences of the personal data breach, and describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject shall not be required if any of the following conditions are met:

- the controller **has implemented appropriate technical and organisational protection measures**, and those measures were applied to the personal data affected by the personal data breach, in particular those that **render the personal data unintelligible** to any person who is not authorised to access it, such as encryption;
- the controller has taken subsequent measures which **ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise**;
- it **would involve disproportionate effort**. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so.

XV. NOTIFICATION OF A PERSONAL DATA BREACH TO THE AUTHORITY

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55 of the GDPR, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

XVI. LODGING A COMPLAINT

If the data subject feels that the controller has infringed his or her data protection rights, he or she may make an official complaint to the Hungarian National Authority for Data Protection and Freedom of Information:

Hungarian National Authority for Data Protection and Freedom of Information

H-1125 Budapest, Szilágyi Erzsébet fasor 22/C
Mailing address: H-1530 Budapest, Postafiók 5
Phone number: +36 1 391 1400
Fax: +36 1 391 1410
Email: ugyfelszolgalat@naih.hu

XVII. REMARK

We have written this policy in accordance with the following pieces of legislation:

- Regulation (EU) 2016/679 (General Data Protection Regulation) of the European Parliament and of the Council 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, and repealing Directive 95/46/EC

- Act CXII of 2011 on the right to informational self-determination and on the freedom of information (referred to as 'Privacy Act')
- Act CVIII of 2001 on certain issues of electronic commerce activities and information society services (especially 13/A)
- Act XLVII of 2008 on the prohibition of unfair commercial practices against consumers
- Act XLVIII of 2008 on the essential conditions of and certain limitations to business advertising activity (especially paragraph 6)
- Act XC of 2005 on the freedom of electronic information
- Act C of 2003 on electronic communications (especially paragraph 155)
- Opinion 16/2011 on EASA/IAB Best Practice Recommendation on Online Behavioural Advertising
- The recommendations of the Hungarian National Authority for Data Protection and Freedom of Information on the privacy policy requirements of prior notification