

## **Privacy notice**

Date of adoption: 2025-03-21

**Disclaimer:** this is an informative English translation of the official Hungarian-language Privacy notice.

## **Data Controller**

Name: Hidden Treasure Tours Ltd.

Registered office: 2376, Hernád, Széchenyi út 5/B.

Address for correspondence and complaints: 2376, Hernád, Széchenyi út 5/B.

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

Phone number: +36706586912

Website: <http://greatsynagogue.hu>

## **Hosting service**

Name: Port Ltd.

Address for correspondence: 9200, Mosonmagyaróvár, Szent István király út 60.

E-mail address: [info@webtar.hu](mailto:info@webtar.hu)

Phone number: +36/96/216-680

## **Description of data processing during the operation of the webshop**

## **Information on the use of cookies**

### **What is a cookie?**

The Data Controller uses so-called cookies when you visit the website. A cookie is a set of information consisting of letters and numbers that our website sends to your browser in order to save certain settings, facilitate the use of our website and help us to collect some relevant statistical information about our visitors.

Some of the cookies do not contain any personal information and cannot be used to identify the individual user, but some of them contain a unique identifier - a secret, randomly generated sequence of numbers - that is stored on your device, thus ensuring your identification. The duration of each cookie is described in the relevant description of each cookie.

### **Legal background and legal basis of cookies:**

We distinguish between three types of cookies: cookies that are essential for the proper functioning of the Website, cookies for statistical purposes and cookies for marketing purposes.

The legal basis for the processing is your consent pursuant to Article 6(1) (a) of the Regulation in the case of statistical and marketing cookies, and the legitimate interest necessary for the functioning of the Website pursuant to Article 6(1)(f) of the Regulation in the case of cookies necessary for the functioning of the Website.

### **Main characteristics of the cookies used by the Website:**

#### **Data processed for the purposes of contracting and performance**

There may be several processing operations for the purposes of contracting and performance. Please note that data processing for complaint handling, warranty management will only take place if you exercise one of these rights.

If you do not make a purchase through the webshop, but are only a visitor to the webshop, the processing for marketing purposes may apply to you if you give us your consent for marketing purposes.

More details on processing for the purposes of contracting and performance:

#### **Order processing**

When processing orders, processing activities are necessary for the performance of the contract.

#### **Data processed**

In the course of data processing, the Data Controller processes your name, address, telephone number, e-mail address, the characteristics of the service purchased, the order number and the date of purchase.

If you have placed an order in the webshop, the processing and the provision of the data are necessary for the performance of the contract.

#### **Duration of processing**

We process the data for a period of 5 years in accordance with the statute of limitations under civil law.

### **Legal basis for processing**

Performance of the contract. [Processing under Article 6(1)(b) of the Regulation]

### **Issue of the invoice**

The processing is carried out in order to issue a legally compliant invoice and to fulfil the obligation to keep accounting records. Pursuant to Article 169 (1) to (2) of the Act, companies are required to keep accounting documents which directly and indirectly support the accounting.

### **Data processed**

Name, address, e-mail address.

### **Duration of processing**

Invoices issued must be kept for 8 years from the date of issue of the invoice, pursuant to Section 169 (2) of the State Act.

### **Legal basis for processing**

Pursuant to Article 159 (1) of Act CXXVII of 2007 on Value Added Tax, the issue of invoices is mandatory and must be kept for 8 years pursuant to Article 169 (2) of Act C of 2000 on Accounting [processing pursuant to Article 6 (1) (c) of the Regulation].

### **Handling of other consumer complaints**

Customer name, phone number, email address, complaint content.

### **Duration of data processing**

Consumer complaints are kept for 3 years under the Consumer Protection Act.

### **Legal basis for processing**

Whether you contact us with a complaint is a voluntary decision, but if you contact us, we are obliged to keep the complaint for 3 years pursuant to Article 17/A (7) of the Consumer Protection Act of 1997 (CLV of 1997) [processing of data pursuant to Article 6 (1) (c) of the Regulation].

### **Data processed in relation to the justification of consent**

When registering, ordering, subscribing to newsletters, the IT system stores the IT data relating to the consent for the purpose of subsequent provability.

## **Data processed**

Date of consent and IP address of the data subject.

## **Duration of data processing**

Due to legal requirements, consent must be verifiable at a later date, therefore the duration of the data storage will be stored for a period of limitation after the termination of the data processing.

## **Legal basis for processing**

Article 7(1) of the Regulation imposes this obligation. [Processing under Article 6(1)(c) of the Regulation]

## **Other processing**

Where the Controller intends to carry out further processing, it shall provide prior information on the essential circumstances of the processing (legal background and legal basis of the processing, purpose of the processing, scope of the data processed, duration of the processing).

## **Recipients of personal data**

Processing for the purpose of storing personal data

Name of the data processor: Port Kft.

Contact details of the data processor:

Telephone number: +36/96/216-680

E-mail address: info@webtar.hu

Address: 9200, Mosonmagyaróvár, Szent István király út 60.

Website: www.webtar.hu

The Data Processor stores personal data on the basis of a contract with the Data Controller. The Processor is not entitled to access the personal data.

## **Processing of data related to online payments**

Name of the controller: **K&H Bank Zrt.**

KH Bank is the data controller.

10105 10355 Öko Hödö, Hungary 10105 Öko Hödö, Hungary Phone number of the data controller: 061/20/30/70 3353355

E-mail address of the controller: bank@kh.hu

Website of the data controller: [www.kh.hu](http://www.kh.hu)

The payment service provider is contracted by the Data Controller to assist in the implementation of the Online Payment, for which purpose data is transferred to the online payment service provider during the purchase process. In doing so, the online payment service provider will process the billing name and address of the data subject, the order number and the date of the order in accordance with its own data processing rules.

The purpose of the data transfer is to provide the online payment service provider with the transaction data necessary for the payment transaction related to the purchase initiated with the online payment service provider.

Legal basis for the transfer: the performance of a contract between you and the Data Controller pursuant to Article 6(1)(b) of the Regulation, which includes the payment by the customer and, in the case of online payment, the transfer of data pursuant to this point is necessary for the payment

The name of the data controller is **PayPal (Europe) S. à r.l.**

The controller is located at 283, route d'Arlon, L-1150 Luxembourg.

The telephone number of the controller is:

E-mail address of the data controller: [enquiry@paypal.com](mailto:enquiry@paypal.com)

Controller's website: [paypal.com](http://paypal.com)

The payment service provider is contracted by the Data Controller to assist in the execution of the Online Payment, for which purpose data is transferred to the online payment service provider during the purchase process. In this process, the online payment service provider will process the billing name and address of the data subject, the order number and the date of the order in accordance with its own data processing rules.

The purpose of the data transfer is to provide the online payment service provider with the transaction data necessary for the payment transaction related to the purchase initiated with the online payment service provider.

Legal basis for the transfer: the performance of a contract between you and the Data Controller pursuant to Article 6(1)(b) of the Regulation, which includes payment by the customer and, in the case of online payment, the transfer of data pursuant to this point is necessary for the payment.

## **Your rights in relation to the processing**

During the period of processing, you have the following rights under the Regulation:

- the right to withdraw consent
- access to personal data and information relating to the processing
- the right to rectification
- restriction of processing,
- the right to access to personal data and to obtain information on the processing of personal data, including the right to access to personal data
- right to object
- the right to portability.

If you wish to exercise your rights, this will involve your identification and the Controller will need to communicate with you. For this purpose, identification will require the provision of personal data (but identification may only be based on data that the Controller already holds about you) and your complaints about the processing will be available on the Controller's email account within the time period indicated in this Notice in relation to complaints. If you have been a customer of ours and would like to be identified for the purposes of complaint handling or warranty handling, please also provide your order ID for identification purposes. We can use this to identify you as a customer.

The Data Controller will respond to complaints about data processing within 30 days at the latest.

### **Right to withdraw consent**

You have the right to withdraw your consent to data processing at any time, in which case the data will be deleted from our systems. Please note, however, that in the case of an outstanding order, withdrawal may result in our inability to deliver to you. In addition, if the purchase has already been made, we may not be able to delete the billing data from our systems under accounting regulations, and if you have a debt to us, we may process your data in the event of withdrawal of consent on the basis of a legitimate interest in the recovery of the debt.

### **Access to personal data**

You have the right to receive feedback from the Data Controller as to whether your personal data is being processed and, if it is being processed, the right to:

- to have access to the personal data processed; and

- to be informed by the Controller of the following information:
  - o the purposes of the processing;
  - o the categories of personal data processed concerning you;
  - o information about the recipients or categories of recipients to whom or with which the personal data have been or will be disclosed by the Controller;
  - o the envisaged period of storage of the personal data or, where this is not possible, the criteria for determining that period;
  - o your right to obtain from the Controller the rectification, erasure or restriction of the processing of personal data concerning you and, in the case of processing based on legitimate interest, to object to the processing of such personal data;
  - o the right to lodge a complaint with a supervisory authority;
  - o if the data have not been collected from you, any available information about their source;
  - o the fact of automated decision-making (where such a process is used), including profiling, and, at least in these cases, clear information on the logic used and the significance and likely consequences for you of such processing.

The purpose of the exercise of this right may be to ascertain and verify the lawfulness of the processing, and the Data Controller may charge a reasonable fee for providing the information in exchange for repeated requests for information.

Access to personal data shall be ensured by the Controller by sending you, by email, the personal data and information processed, after you have identified yourself. If you are registered, we will provide access so that you can view and verify the personal data we process about you by logging into your account.

Please indicate in your request whether you are requesting access to personal data or information about data processing.

### **Right to rectification**

You have the right to have inaccurate personal data relating to you corrected by the Data Controller without delay at your request.

### **Right to restriction of processing**

You have the right to obtain from the Controller, at your request, the restriction of processing if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the Controller to verify the accuracy of the personal data, if the accuracy of the data can be established immediately, the restriction shall not apply;
- the processing is unlawful, but you object to the erasure of the data for any reason (for example, because the data are important to you for the purposes of pursuing a legal claim) and therefore do not request the erasure of the data but instead request the restriction of their use;
- the Controller no longer needs the personal data for the purposes for which they are processed, but you require them for the establishment, exercise or defence of legal claims; or
- you have objected to the processing, but the controller may have a legitimate interest in the processing, in which case, until it is established whether the controller's legitimate grounds override your legitimate grounds, the processing should be restricted.

Where processing is subject to restriction, such personal data, except for storage, may only be processed with the consent of the data subject 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 important public interests of the Union or of a Member State.

The controller shall inform you in advance (at least 3 working days before the restriction is lifted) of the lifting of the restriction on processing.

### **Right to erasure - right to be forgotten**

You have the right to obtain from the Controller the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Controller;
- You withdraw your consent and there is no other legal basis for the processing;
- You object to processing based on legitimate interest and there is no overriding legitimate ground (i.e. legitimate interest) for the processing,
- the personal data have been unlawfully processed by the Controller and this has been established on the basis of the complaint,
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the Controller.



If the Controller has disclosed personal data processed about you for any lawful reason and is required to delete it for any of the reasons set out above, it shall take reasonable steps, including technical measures, taking into account available technology and the cost of implementation, to inform other controllers that have processed the data that you have requested the deletion of the links to or copies of the personal data in question.

Deletion does not apply where the processing is necessary:

- for the exercise of the right to freedom of expression and information;
- to comply with an obligation under Union or Member State law that requires the controller to process personal data (such as processing in the context of invoicing, where the storage of the invoice is required by law) or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller;
- to lodge, enforce or defend legal claims (e.g. if the Data Controller has a claim against you and has not yet settled it, or if a consumer or data management complaint is pending).

### **Right to object**

You have the right to object to the processing of your personal data based on legitimate interests at any time on grounds relating to your particular situation. In such a case, the Controller may no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data may no longer be processed for those purposes.

### **Right to portability**

If the processing is automated or if the processing is based on your voluntary consent, you have the right to request the Data Controller to receive the data you have provided to the Data Controller, which the Data Controller will make available to you in xml, JSON or csv format, and if technically feasible, you may request that the Data Controller transfer the data in this format to another data controller.

### **Automated decision-making**

You have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or similarly significantly affects you. In such cases, the controller must take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right to obtain human intervention by the controller, to express his or her point of view and to object to the decision.

The above shall not apply where the decision:

- necessary for the conclusion or performance of a contract between you and the controller;
- it is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

### **Data security measures**

The Data Controller declares that it has implemented appropriate security measures to protect personal data against unauthorised access, alteration, disclosure, transmission, disclosure, erasure or destruction, accidental destruction or accidental damage and inaccessibility resulting from changes in the technology used.

The Data Controller will make every effort, within its organisational and technical possibilities, to ensure that its data processors also take appropriate data security measures when working with your personal data.

### **Remedies**

If you believe that the Data Controller has violated a legal provision on data processing or has failed to comply with a request, you may initiate an investigation procedure with the National Authority for Data Protection and Freedom of Information to stop the alleged unlawful processing (mailing address: 1363 Budapest, Pf. 9., e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), telephone numbers: +36 (30) 683-5969 +36 (30) 549-6838; +36 (1) 391 1400).

You are also informed that in the event of a breach of the legal provisions governing data processing or if the Controller has not complied with a request, you may bring a civil action against the Controller before a court.

### **Amendment of the Privacy Notice**

The Data Controller reserves the right to amend this Privacy Notice in a way that does not affect the purpose and legal basis of the processing. By using the website after the amendment has entered into force, you accept the amended privacy notice.

If the Data Controller wishes to carry out further processing of the data collected for purposes other than those for which they were collected, it will inform you of the purposes of the processing and the information below before carrying out the further processing:

- the duration of the storage of the personal data or, if this is not possible, the criteria for determining the duration;
- your right to request the controller to access, rectify, erase or restrict the processing of personal data concerning you and, in the case of processing based on legitimate interest, to object to the processing of personal data and, in the case of processing based on consent or a contractual relationship, to request the right to data portability;
- in the case of processing based on consent, that you may withdraw your consent at any time,
- the right to lodge a complaint with a supervisory authority;
- whether the provision of the personal data is based on a legal or contractual obligation or is a precondition for the conclusion of a contract, whether you are under an obligation to provide the personal data and the possible consequences of not providing the data;
- the fact of automated decision-making (if such a process is used), including profiling, and, at least in these cases, clear information about the logic used and the significance of such processing and its likely consequences for you.

Processing may only start thereafter, if the legal basis for the processing is consent, to which you must give your consent in addition to the information.

This document contains all relevant information on data processing in relation to the operation of the webshop in accordance with the European Union's General Data Protection Regulation 2016/679 (hereinafter referred to as the Regulation. GDPR) and the 2011 Act CXII of 2011 (hereinafter referred to as the Infotv.).