

**Information on the processing of personal data by CPI Hungary Kft.**

**Introduction**

Below you will find information on the processing of your personal data by **CPI Hungary Kft.**, Corporate ID No. 01-09-469614, with its registered office at 1139 Budapest, Váci út 99-105., Balance Hall, 6<sup>th</sup> floor (hereinafter the “**Company**”) provided in accordance with Regulation (EU) 2016/679 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 (hereinafter the “**GDPR**”) and related applicable data protection legislation.

The Company, as a controller of your personal data, determines the means and purposes of the processing of your personal data as specified below in this document. With regard to the processing of personal data, you can also exercise the below-mentioned rights towards the Company.

You can contact the Company in writing at the address 1139 Budapest, Váci út 99-105., Balance Hall, 6<sup>th</sup> floor, by phone at +36-1-225-6600, or via email at [hungary@cpigg.com](mailto:hungary@cpigg.com).

**Processing of your personal data**

The Company processes your personal data only to the necessary extent and for the period necessary to achieve a specific purpose on a lawful basis.

Below you will find an overview of the purposes for which the Company processes your personal data, including a description of the processing purpose. Each purpose of processing also includes information on:

- Lawful basis for processing of your personal data for the given purpose;
- Extent of processing;
- Source of the personal data;
- Information on who can obtain access to your personal data; and
- Information on how long the Company will store your personal data.

In case your personal data are processed on the lawful basis of legitimate interest of the Company or a third party, information on the nature of this legitimate interest is also included.

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**Purpose of the processing**

**Cookies, improvement of webpage-user experience**

Description of the purpose of the processing

The Company uses cookies on the [www.cpiclub.hu](http://www.cpiclub.hu) webpage owned by the Company (the “**Webpage**”) in order to adjust its services to the need of the data subject by collecting and storing information relating to the Webpage browsing preferences, personal settings and identification of the data subject.

Cookies are short word files, which are stored by the Webpage on the computer and mobile device of the user visiting the Webpage. With the help of cookies the Webpage remembers for a certain amount of time the operations and personal settings of the user (e.g. user name, language, font size and individual setting relating to the visualisation of the webpage), thus the user does not have to give them again each time he/she visits the Webpage or navigate from one webpage to another.

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When the user visits the Webpage the following types of cookies are used:

- Temporary cookies: These cookies are required for navigation on the Webpage. These cookies are either placed again after 30 minutes or deleted after leaving the page.
- Permanent cookies: These cookies are used to recognize the browser of the user again when the user next time visits the Webpage. These cookies are stored on the computer of the user until they are manually deleted by the user.
- Performance cookies: The purpose of these cookies is to allow the Company to collect anonym data from the habits of the user in relation to the Webpage. These cookies register the subpages and links visited. These cookies make it possible for the Company to use the preferences of the user, when the user visits the Webpage again. As a result of this the Company can offer interesting information and offers to the user. These data are stored for 30 days.
- Functionality cookies: These cookies are used for storing the settings (such as language or font size settings), which are set by the user on the Webpage. As a result of this the functionality of the Webpage is improved for the convenience of the user. These cookies are deleted after 30 minutes.
- Third Party Cookies: These cookies are used for collecting anonym data from the habits of the user in relation to the Webpage and other webpages. This allows the Company to handle the preferences of the user more appropriately, when the user next time visits the Webpage. As a result of this the Company can offer interesting information and offers to the user. In case of Google Analytics, Pingdom, Polyfill, BingAds and GoogleAdwords Third Party Cookies are applied in connection with detailed information can be found below:
  - Google Analytics: This Webpage is using Google Analytics and [Google Analytics 4 \(GA4\)](#), which is the analysis service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics is using cookies, which are analyzing the use of the Webpage. The information gained by the cookies (including the IP-address of the user and URL address of the webpages visited) are usually transferred to and stored on one of the servers of Google in the USA. By

activating IP-anonymisation IP address on this Webpage is shortened before the transfer thereof within the member states of the European Union or to other contracting countries of the agreement on the European Economic Community. The full IP address shall be transferred to one of the servers of Google in the USA only in exceptional cases, where it is shortened. These information are used by Google in the interest of the Company to evaluate the habits of the user on the Webpage, to prepare reports on the activities of the Webpage and to perform further services to Company in connection with the Webpage and Internet use. The anonym IP address from the browser of the user transferred by Google Analytics will not be merged with other data of Google. These data are stored for 6 months. The Company is not storing the data collected by Google Analytics. User may prevent the collection of the data generated by the cookies relating to the use of the Webpage (including the IP address of the user) for Google and the processing thereof by Google if user downloads and installs the Browser Plugin available at the following link:

<http://tools.google.com/dlpage/gaoptout?hl=de>. Detailed information regarding the user terms and privacy policy of Google are available at the following link: <http://www.google.com/analytics/terms/de.html> and <https://www.google.at/intl/at/policies/>

- Google AdWords: Google AdWords is the service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google AdWords is using cookies. If the user arrived to the Webpage through a Google advertisement, Google AdWords places a cookie on the terminal of the user. During this a pseudonymised identification number (ID) is created. With the help of this the Company and Google is able to recognize that someone clicked on the advertisement and by that someone arrived to the Webpage. Anonymised statistics may be prepared from this. The use of AdWords cookies allows Google and the Company to place the advertisement more accurately on the basis of the

evaluation of the previous visits of the user on the Webpage and other webpages. These cookies are deleted after 30 days. The information generated by the cookies (including IP addresses) are transferred by Google to a server in the USA, where they are stored. Google complies with the data protection provisions of the “Privacy Shield” Agreement and is a registered member of the “Privacy Shield” program of the U.S. Department of Commerce. Google shall only transfer the data to third parties on the basis of legal regulations or within the framework of processing orders. If the user logs in with a Google account, Google matches the account information with the information processed in AdWords. User may not only prevent the storing of Google AdWords cookies by appropriately setting his/her browser, but by clicking on the following link:

<https://myaccount.google.com/intro/privacycheckup/1?hl=de>, if user logged in with his/her Google account. In case the user did not use his/her Google account when logging in, user may modify the settings of the browser. Detailed information regarding the user terms and privacy policy of Google are available at the following link: <https://policies.google.com/privacy?hl=de>.

- Meta Pixel: A Meta Pixel is the service of Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland („Meta”) szolgáltatása. Meta Pixel is using cookies. If the user arrived to the Webpage through a Meta Pixel advertisement, meta Pixel places a cookie on the terminal of the user. During this a pseudonymised identification number (ID) is created. With the help of this the Company and Meta Pixel is able to recognize that someone clicked on the advertisement and by that someone arrived to the Webpage. Anonymised statistics may be prepared from this. The use of Meta cookies allows Meta Pixel and the Company to place the advertisement more accurately on the basis of the evaluation of the previous visits of the user on the Webpage and other webpages. These cookies are deleted after 30 days. The information generated by the cookies (including IP addresses) are transferred by Meta Pixel for

evaluation to, among others, the United States, Ireland, Denmark and Sweden a server in the USA, where they are stored. Meta Pixel shall only transfer the data to third parties on the basis of legal regulations or within the framework of processing orders. With the help of the Meta-cookie, a direct connection is established with Meta's servers when visiting the given website. In doing so, the Meta server is informed that you have visited the Webpage and what activities you have performed on the Webpage. Meta assigns this information to your Facebook and/or Instagram user account. If you visit the social media sites Facebook or Instagram or the pages of a Meta Audience Network partner, advertisements (Ads) tailored to your interests will be displayed. The user can prevent the storage of Meta-cookies not only by properly setting her browser, but also by clicking on the following link (<https://developers.facebook.com/docs/meta-pixel>). Detailed information on Meta Pixel's terms of use and data protection declaration can be found at the following address: [Meta Privacy Policy - How Meta collects and uses user data | Privacy Center | Manage your privacy on Facebook, Instagram and Messenger | Facebook Privacy](#)

User has the possibility to maintain and/or if he/she so wishes to delete the cookies. For more information please visit [aboutcookies.org](http://aboutcookies.org). User can delete all cookies stored on the computer and in case of most browsers user can disable the installation of the cookies, i.e. user can set his/her browser in a way that it does not allow the placement of unique identification sign on the computer of the user. However, in this case it may happen that in every case the user visits a given webpage user shall manually perform certain settings and calculate with the fact that certain services and functions may not operate (e.g. in case of tailor made solutions), user cannot use certain functions of the service to the fullest extent possible.

The links of the settings of the most popular browsers and cookies are the following:

Google Chrome:

<https://support.google.com/accounts/answer/61416?hl=en>

Mozilla Firefox:

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Microsoft Internet Explorer:

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies#>

Microsoft Edge:

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

Safari:

[https://support.apple.com/kb/PH21411?locale=hu\\_HU&viewlocale=en\\_US](https://support.apple.com/kb/PH21411?locale=hu_HU&viewlocale=en_US)

Lawful basis	<p>The freely given, specific, informed and unambiguous consent of the user by using the Webpage (GDPR Article 6 paragraph (1) subparagraph a)).</p> <p>The legitimate interest of the Company to achieve the purposes specified at each cookie types (GDPR Article 6 paragraph (1) subparagraph f)).</p>
Category of personal data	IP address of the computer of the user if the cookie specified above collects personal data.
Source of personal data	User as data subject
Recipients of personal data	<p>Developer of the Webpage:</p> <p>Company name: Utazzithon.hu kft.</p> <p>Registered seat: 2161 Csomád, Levente utca 14/A.</p>
Storage period of personal data	Until the period specified for each cookie type in the description of the purpose of processing.

#### Transfers of your personal data to third countries or international organisations

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes will not transfer your personal data to any third countries or international organisations.

#### Automated decision-making

An automated decision is a decision made by the Company or a recipient to which the Company gives access to your personal data for the above stated purpose, that is based solely on automated processing of your personal data (including profiling) and that produces legal effects concerning you or similarly significantly affects you.

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes will not use your personal data for automated decision-making.

**What are your rights with respect to the processing of personal data?**

With respect to the processing of your personal data by the Company, you can request the Company:

- To give you access to your personal data, whereby you can obtain, in particular, information whether your personal data are processed, for what purpose, what is the scope of processed data and who has been given access to your personal data, if relevant. You can also be provided with a copy of your personal data undergoing processing;
- To rectify inaccurate or incorrect data or to complete incomplete personal data;
- To erase the personal data, e.g. if the purpose of processing ceases to apply or if your personal data are processed unlawfully;
- To restrict the processing of your personal data;
- To data portability, which allows you to obtain personal data concerning you, which you have provided to the Company, in a structured and machine-readable format either for yourself or for another controller; and
- To make sure that you are not subject to any automated decision-making (you found out whether such decision-making takes place or not in the preceding chapter).

You can also raise an objection against the processing of your personal data, should the processing of your personal data be based on the lawful basis of legitimate interest, or to lodge a complaint with the Office for Personal Data Protection. The contact details are as follows:

**Hungarian National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11.  
1363 Budapest, Pf.: 9.  
Phone: +36-1-391-1400  
www.naih.hu  
ugyfelszolgalat@naih.hu

**How you can exercise your rights?**

You can request the exercise of your rights via a written or oral request. In order to provide sufficient protection of the personal data processed by the Company and to prevent personal data misuse from taking place, the Company has introduced rules for the verification of your identity stated below.

You may request the exercise of your rights by:

Written request

To request the exercise of the particular right in writing, please fill in the request form available at [www.cpigroup.hu/pdf/gdpr\\_hu.pdf?v071](http://www.cpigroup.hu/pdf/gdpr_hu.pdf?v071) (CPI Property Group, Group Data Protection Policy, Appendix 2). Your signature on the request form needs to be officially certified. Depending on local law, you may be able to have your signature certified e.g. at a notary office, post office, attorney-at-law, consulate or municipal/regional authority. The signature has to be officially certified in a country where the request is submitted to the given CPIPG company in person (e.g. in hotel, office or other premises designated by the Company) or sent via mail using a postal services provider. In case of sending the request via mail using a postal service provider in the countries outside of the EEA or the European Union, you may be contacted by the Company in order to further verify your identity.

Oral request

You may also request the exercise of the particular right in person at the Company's registered seat. Your identity will be verified by the Company's designated employee (e.g. at a front desk), based on the

submission of one of the following documents: personal ID card, passport or other document with a photo sufficiently eligible to enable your clear identification.

The exercise of your rights shall not affect the rights of third parties.

Please note that should your requests be manifestly unfounded or excessive, in particular because of their repetitive character, the Company may require a reasonable fee, not exceeding the necessary costs of the provision of the above stated information or arranging the exercising of your rights, for the purposes of responding to your request.

#### **Is the provision of your personal data mandatory?**

If the Company processes your personal data based on your consent, the processing of such data is voluntary. In this case, you are not required to grant your consent and provide your personal data to the Company.

Your consent to the processing of your personal data must be a freely given, specific, informed and unambiguous expression of your will, whereby you give the Company your permission, in the form of a statement or another evident confirmation, to process your personal data.

The Company may process your personal data based on a different lawful basis, e.g. lawful basis of performance of a contract, of compliance with a legal obligation or for purposes of the legitimate interest. In this situation, provision of your personal data is necessary, because, the Company may need such personal data e.g. to conclude and perform a contract with you or to meet legal obligations. If you decide not to provide the personal data to the Company, it would not be possible to conclude the contract or to fulfil the given legal obligations.

#### **How and when can you withdraw your consent to personal data processing?**

You may withdraw the consent you have granted to the Company at any time, even before the end of the period for which it was given.

You may withdraw your consent:

- Electronically via email at [hungary@cpipg.com](mailto:hungary@cpipg.com); or
- In writing at the following address:  
1139 Budapest, Váci út 99-105., Balance Hall, 6<sup>th</sup> floor

The withdrawal of your consent shall have no impact on the processing of your personal data conducted before the withdrawal.