

PRIVACY POLICY

Data management – social media sites Management of followers, sympathizers' data

Applicable from 2th Sept 2024

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons regarding processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

1. Data controller

Name of data controller:		Telvice Zrt.
Address of data controller:		2040 Budaörs, Szabadság út 135.
Contact details of data controller:	e-mail	telvice@telvice.hu
	telephone	+36 20/235-7957
	website	https://www.telvice.hu/
Name of data protection officer		-
Contact details of data protection officer		-

2. Data processed

Scope of data processing, purpose and legal basis for data processing, data processing (storage) period

Personal data	Purpose of data processing	The legal basis for processing data	Duration (storage) of data processing:
Information of public profile Comments	Promoting the work of the data controller on social media sites, managing followers, reactions, comments, providing information, sharing content, establishing relationships, building relationships, building brands Sending targeted advertisements, using statistics	Consent of the data subject – GDPR Article 6(1)(a)	Until the withdrawal of consent / deletion of the comment by the data subject or, at the latest, until the social site is closed. For more detailed information, please see the privacy policy of the social networking site. The data controller does not store personal data during the use of social platforms. It has access to the data while managing the site and indirectly processes data through certain social media services (e.g., advertising) – it does not have direct access to the data.

Related legislation

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Does profiling occur during data processing?

Answer	Short, understandable description of profiling
No	---

Does automated decision-making occur during data processing?

Answer	Short, understandable description of automatization
No	

If yes, data subject has the right to request for manual, human intervention.

Source of processed personal data:

The data subject

Data will be transmitted to:

Category	Name of the company, address of headquarters, business activity
Data processors (performing technical tasks related to data processing)	<p>LinkedIn 2029 Stierlin Court Ste 200 Mountain View, California, 94043 United States Social media,</p> <p>Twitter International Unlimited Company (X Corp.) One Cumberland Place, Fenian Street Dublin 2, D02 AX07 IRELAND Social media,</p> <p>Meta Platforms (Messenger) Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour Dublin 2, Ireland Communication platforms, Facebook Google LLC. Google LLC, San Bruno, 94043 USA, California YouTube Social media</p>
Recipients	

Transmission of data to a third (non-EU) country

Name of the company, place of transmission, guarantee of transmission, purpose of transmission
<p>LinkedIn, USA, Terms and conditions, Privacy Policy Data Privacy Framework, https://www.linkedin.com/legal/privacy-policy https://www.dataprivacyframework.gov/list, data storage</p> <p>Meta Platforms (Facebook, Instagram), USA, Privacy Policy Data Privacy Framework, https://hu-hu.facebook.com/privacy/policy https://www.dataprivacyframework.gov/list, access to parent company</p> <p>Twitter International Unlimited Company (X Corp.), USA, Privacy Policy Data Privacy Framework, https://x.com/hu/privacy#x-privacy-9.1 https://www.dataprivacyframework.gov/list, data storage</p> <p>Meta Platforms (Messenger), USA, Privacy Policy Data Privacy Framework, https://hu-hu.facebook.com/privacy/policy https://www.dataprivacyframework.gov/list, access to parent company,</p> <p>Google LLC., USA, Privacy and Terms and Conditions, Data Privacy Framework, https://policies.google.com/privacy?hl=hu&fg=1 https://www.dataprivacyframework.gov/list, data storage</p>

Joint data processing occurs:

Answer	Name of joint data controller, its headquarters
Yes	Meta Platforms (Facebook, Instagram) Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland Social media - Facebook, Instagram

Access to data and data security measures:

Restriction of access	<p>Personal data are only accessible for those employees who need them for the performance of their duties, and the managing director has access the data - this is ensured by the company through authorization management.</p> <p>The pieces of profile / user information are public for anyone on social media sites.</p>
Data security measures	<p>Antivirus on computers</p> <p>Code or biometric protection on mobile devices</p> <p>Computers are password protected</p> <p>Events of computer work are logged</p> <p>Rights management</p> <p>Applications are password protected</p>

3. Rights of data subject:

Rights of data subject based on legal basis and their explanations
<p><i>Right to information</i> - Data Subject shall have the right to find out the way personal data is handled before data processing begins</p> <p><i>Right to rectification</i> - Data Subject is entitled to request the correction of his/her personal data if stored data by data controller do not correspond to reality and he/she can prove it.</p> <p><i>Right of access</i> - Data Subject shall have the right to request for personal data stored about him/her from the data controller.</p>

Right to erasure ('right to be forgotten') - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.

Right to withdrawal of consent - If data processing is based on consent, Data Subject may withdraw consent previously given at any time. Acceptance of withdrawal request may also mean deletion of data but if another legal basis supports data processing, data processing will only end in relation to the specific data processing purpose.

Right to restriction of processing - If the data subject does not consider the controller authorized, they can request the suspension of data processing during the investigation.

Right to data portability - The data subject shall have right to request their personal data stored in digital tabular form.

Right to review of automated individual decision-making - Data Subject may have the right to request for manual review of all data processing where data controller has applied automated decision-making with legal effect on data subject.

4. Exercise of rights of data subject

If data subject has submitted a request to the data controller related to exercising of his/her rights described in point 3, the data controller shall respond without delay and at the latest within one month of receipt of the request, and also shall inform data subject regarding the measures taken in case of his/her request. If it is necessary, this deadline can be extended by another two months.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject 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.

5. Filing a complaint

Data subject shall have the right to lodge a complaint with a supervisory authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Headquarters	9-11 Falk Miksa road, H-1055 Budapest
Postal address	Mailbox 9., H-1363 Budapest
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial remedy

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

The data subject may apply to the court against the data controller in order to protect his/her data if he/she thinks that the data controller has violated the regulations of processing his/her personal data. The lawsuit may be initiated by data subject at the competent court based on his/her residence or temporary residence– according to his/her choice. During the lawsuit a person who does not have any legal capacity can be a party concerned as well. The data protection authority can intervene in the lawsuit in order to win the case for data subject.

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

By visiting data controller's social network sites and by initiating activity data subject expresses its consent to process and store its data in accordance with the provisions of related privacy policy.