Privacy Policy

ITRON Kft.

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Table of contents

1 Purpose of the Privacy Policy 3
2 Change tracking 3
3 General provisions 3
4 Legal background 3
5 Definitions 4
6 Controller's details and contact information 4
7 Data protection officer 4
8 Processors 5
9 Scope, legal basis and withdrawal of consent for the personal data processed 6
9.1 Personal data provided when making contact 6
9.2 Personal data provided in the course of telephone or direct contact 6
9.3 Contact in the case of applications for advertised jobs 6
9.4 Cookies and IP address 7
9.5 CV data 8
9.6 Hosting data 8
9.7 Customer data / Event participant data 8
9.8 Parcel delivery data 8
9.9 Data processing related to the use of an electronic surveillance system 9
10 Transfer of data abroad or to an international organisation 9
11 Rights of the data subject and means of enforcing them 9
11.1 Right to transparent information 9
11.2 Right of access 10
11.3 Right to data portability 10
11.4 Right to rectification 10
11.5 Right to erasure (“right to be forgotten”) 10
11.6 Right to object 10
11.7 Right to restriction of processing 11
11.8 Automated individual decision-making, including profiling 11
12 Automated decision-making and profiling 11
13 Personal data breach, data protection register 11
14 Recourse to the courts 11
15 Official proceedings, lodging a complaint 12
16 Other provisions 12

1 Purpose of the Privacy Policy

The purpose of this Privacy Policy is to define the principles and rules governing the processing of personal and other data provided by visitors to the website www.barberhub.hu in the cours**e of using** the website and processed by ITRON Kft. (hereinafter: the Service Provider / Controller), in order to ensure that the principles of data protection and the requirements of data security are upheld.

2 Change tracking

The data protection policies relating to the Service Provider's data processing activities are continuously available at www.barberhub.hu/adatvedelem. The Service Provider reserves the right to amend this Policy at any time.

3 General provisions

The Service Provider processes personal data confidentially, in accordance with the applicable legal requirements, ensures their security, takes the necessary administrative, logical and physical security and organisational measures, and establishes the procedural rules necessary to give effect to the relevant provisions of the applicable legislation.

In the course of data processing, the Service Provider maintains confidentiality: it protects information so that only those who are authorised can access it; integrity: it protects the accuracy and completeness of the information and of the methods of processing; and availability: it ensures that, whenever an authorised user needs it, they can actually access the required information and the related tools are available.

The Service Provider, as controller, undertakes that all data processing related to its activities complies with the provisions of this Privacy Policy and of the relevant applicable legislation.

The data protection officer appointed by the Service Provider

a. participates in, and assists with, decisions relating to data processing and the safeguarding of data subjects' rights;

b. monitors compliance with this Act and other legislation on data processing, as well as with the internal data protection and data security rules and the data security requirements;

c. investigates the notifications received and, if unauthorised data processing is detected, calls on the controller or the processor to put an end to it;

d. ensures that training on data protection is provided.

e. ensures that the legal requirements are met within the organisation

f. ensures, together with the processors involved, that the legal requirements relating to data protection are met

4 Legal background

The Service Provider is obliged to comply with the legal provisions on the processing of personal data at every stage of data processing. The data processing carried out by the Service Provider is governed primarily by the provisions laid down in the following legislation:

- Act V of 2013 on the Civil Code (“Civil Code”)
- 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, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR);
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (“Privacy Act”);

5 Definitions

Term	Description
data subject	Any natural person identified or identifiable, directly or indirectly, on the basis of specific personal data.
personal data	Any data that can be associated with the data subject – in particular the data subject's name, identifier, and one or more items of knowledge specific to their physical, physiological, mental, economic, cultural or social identity – as well as any conclusion that can be drawn from the data concerning the data subject.
consent	A voluntary and explicit indication of the data subject's wishes, based on adequate information, by which they give their unambiguous agreement to the processing of personal data relating to them, either in full or in respect of specific operations.
objection	A statement by the data subject in which they object to the processing of their personal data and request the termination of the processing or the erasure of the processed data.
processing	Any operation or set of operations performed on personal data, irrespective of the procedure applied, such as collection, recording, storage, organisation, alteration, use, transfer, disclosure, alignment or combination, restriction, erasure and destruction, as well as preventing further use of the data, taking photographs, audio or visual recordings, and recording physical characteristics suitable for identifying a person (e.g. fingerprints, palm prints, DNA samples, iris images).
technical data processing	The performance of technical tasks related to processing operations, irrespective of the method and means used to carry out the operations and of the place of application, provided that the technical task is performed on the data.
data transfer	Making data available to a specified third party.
disclosure	Making data available to anyone.
controller	The natural or legal person, or organisation without legal personality, which, alone or jointly with others, determines the purposes of the processing of personal data, takes and implements decisions concerning the processing (including the means used), or has them implemented by a processor it has engaged.
processor	The natural or legal person, or organisation without legal personality, which processes data on the basis of a contract – including a contract concluded pursuant to a legal provision.
erasure	Making data unrecognisable in such a way that it can no longer be restored.
data set (filing system)	The totality of the data processed in a single register.
third party	A natural or legal person, or organisation without legal personality, that is not the same as the data subject, the controller or the processor;

6 Controller's details and contact information

- **Name of the controller:** *ITRON Kft.*
- **Registered office of the controller:** *1115 Budapest, Fejér Lipót utca 34.*
- **Telephone number of the controller:** *+36304289127*
- **Company registration / registry number:** *01-09-424963*
- **Tax number:** *32455289-1-43*
- **E-mail address:** *itron.kft@gmail.com*

- **Website operated by the controller:** *……..*

7 Data protection officer

None is appointed

8 Processors

- **Name of the processor:** Magyar Hosting Kft.
- **Registered office of the processor:** 1132 Budapest, Victor Hugo utca 18-22.
- **Company registration number:** *Cg. 01-09-968314*
- **Tax number:** 23495919-2-41

Magyar Hosting Kft. receives, electronically in the form of server logs, all data sent and received through every backend interface of the website, and stores them on its own server for operation and maintenance purposes. The logs contain the personal data received via the contact form (name, e-mail address, telephone number).

- **Name of the processor:** Meta Inc.
- **Registered office of the processor:** 1 Hacker Way, Menlo Park, CA 94025

Meta Inc. receives, electronically in the form of logs, the personal data (postal address, telephone number) that customers provide, beyond their Facebook registration, for the conduct of prize games, for maintenance purposes.

- **Name of the processor:** Google Inc.
- **Registered office of the processor:** 1600 Amphitheatre Parkway, Mountain View, CA 94043

Google Inc. receives, electronically in the form of logs, the personal data (name, address, telephone number, e-mail address, bank card number) related to the AdWords advertisements run by **the company name**, for administrative purposes (invoicing, settlement of advertising costs).

- **Name of the processor:** YouTube (Google Inc.)
- **Registered office of the processor:** 1600 Amphitheatre Parkway, Mountain View, CA 94043

YouTube receives, electronically in the form of logs, the videos made of participants at events organised by **the company name**, and the registration data of registered members who engage in related expressions of opinion (likes, comments).

- **Name of the processor:** MailerLite, Inc
- **Registered office of the processor:** 548 Market St, PMB 98174, SF, CA 94104-5401

MailerLite receives, electronically in the form of logs, the videos made of participants at events organised by **the company name**, and the registration data of registered members who engage in related expressions of opinion (likes, comments).

The Service Provider has a contractual obligation, meeting the legal requirements, with each processor, which ensures that personal data may be processed only on the written instructions of the controller, that the processor undertakes a duty of confidentiality, sets out guarantees regarding the processor's IT and other security conditions, and that, on request, the processor makes all necessary information available to the controller. Data subjects consent to the transfer of data to each of the above processors where the conditions detailed above are met.

9 Scope, legal basis and withdrawal of consent for the personal data processed

Below we set out in detail, for each case:

- the purpose of the processing
- the legal basis of the processing
- which personal data are processed
- who the data subjects are
- whether consent can be withdrawn
- whether the data subject is obliged to provide the personal data
- what consequences may follow if the data subject does not provide the personal data
- how long the controller stores the personal data provided

Voluntary consent to data processing:

By accepting this Privacy Policy, users expressly consent to the Controller processing their personal data as set out in this Policy. If a visitor provides personal data that is not their own, the person providing the data is obliged to obtain the consent of the data subject. In the case of processing based on voluntary consent, data subjects may withdraw their consent at any stage of the processing, which does not affect the lawfulness of the processing carried out earlier.

9.1 Personal data provided when making contact

The **purpose of the processing** is to serve data subjects in a personalised way and to send price quotations at the request of data subjects. The **legal basis of the processing** is the data subject's voluntary consent to the processing, i.e. acceptance of the content of the Privacy Policy by submitting the contact form. The **personal data processed** are the name provided by the data subject, and the data subject's own e-mail address and telephone number. The **data subjects** affected by the processing are all interested persons who initiate electronic contact on the website. **Consent can be withdrawn** by requesting the erasure of the submitted data; however, withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal. The data subject is **obliged** to provide the data, because identification in the future cannot be carried out without the listed data. If the **data subject does not provide the personal data**, contact cannot be made; however, the data subject can continue to view the public parts of the website without restriction. The **storage period** lasts until the erasure of the data provided is requested.

9.2 Personal data provided in the course of telephone or direct contact

The **purpose of the processing** is to serve data subjects in a personalised way and to send price quotations at the request of data subjects. The **legal basis of the processing** is the data subject's voluntary consent to the processing; the recording of the data is initiated by the data subject. The **personal data processed** are the data subject's name, telephone number and own e-mail address. The **data subjects** affected by the processing are all interested persons who initiate contact. **Consent can be withdrawn** by e-mail or telephone; however, withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal. The data subject is **obliged** to provide the data, because identification in the future cannot be carried out without the listed data. If the **data subject does not provide the personal data**, a quotation cannot be given. The **storage period** is 1 year following the giving of the quotation.

9.3 Contact in the case of applications for advertised jobs

Applications for open positions can be submitted by letter sent to the e-mail address found under the “Career” menu item of the www.barberhub.hu website. In addition, a job application can also be submitted on paper at the BarberHub salon (1114 Budapest, Bartók Béla út 76.).

The Controller stores the job applications received and the data provided on application. The purpose of the processing: to assess the application of the applicant for the position advertised by the Controller, and to notify the applicant of future job opportunities.

The legal basis of the processing: the data subject's voluntary consent (Article 6(1)(a) GDPR) The scope of the personal data processed: the date of receipt of the application, the type of application (job offer, own initiative …), the status of the application (withdrawal, invitation, etc.), written application, the position applied for, name, birth name, date of birth, home address, nationality, sex, telephone number, e-mail address, as well as other personal data contained in the CV, the motivation letter and other documents attached to the application (certificate, letter of recommendation, etc.) and other personal data communicated during the personal interview, e.g. a photograph of the applicant, previous periods of service, trade learned, professional qualifications and educational attainment, special qualifications, the earliest possible start date, requested notice period, salary expectation, extent of employment (full-time or part-time), data required by law and relevant to employment, information on how the applicant learned of the job, willingness to travel, a declaration on the use of their own car, and, where applicable, information relating to further employment or other legal relationships for work, severe disability, and legal representative.

The duration of the processing: if the data subject has not consented to the further storage of the data, the Controller erases the data provided to it within 30 days of the closure of the selection procedure. If the data subject has expressly consented to the further storage of the data provided by them for the purpose of offering them future job opportunities, the Controller retains the data received with the application for 12 months following the closure of the selection procedure.

Possible consequences of failure to provide data: the data subject will not be able to apply for the job offers published by the Controller.

9.4 Cookies and IP address

The Service Provider places an anonymous user identifier (cookie) on the Data Subject's computer, which in itself is in no way capable of identifying the Data Subject and is suitable only for recognising the Data Subject's device; providing a name, e-mail address or any other personal information is not necessary, because when this solution is used the User does not hand over personal data to the Service Provider, and the exchange of data takes place solely between machines.

The user is entitled to prohibit the placing of the unique identifier (cookie) on their computer through their browser settings. The user is entitled to prohibit the use of marketing and other types of cookies in the pop-up window displayed when visiting websites.

The Service Provider processes cookies for the **data processing purpose** of learning more about the information usage habits of Data Subjects, thereby improving the quality of its services and displaying customised pages and marketing (advertising) materials during visits to the website. The **legal basis of the processing** is the data subject's voluntary consent to the processing; when opening the website, the data subject can regulate the operation of cookies in a pop-up window. The **personal data processed** are the cookies used by Google Analytics, cookies that support the operation of the website, and cookies used for marketing purposes. The **data subjects** affected by the processing are all interested persons who initiate contact. **Consent can be withdrawn** by e-mail or telephone; however, withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal. The data subject is **obliged** to provide the data, because identification in the future cannot be carried out without the listed data. If the **data subject does not provide the personal data**, a quotation cannot be given. The **storage period** is 1 year following the giving of the quotation.

Cookies collect information about visitors and their devices; they remember visitors' individual settings, which may be used, for example, when using online transactions, so that they do not have to be typed in again; they make the website easier to use; and they provide a quality user experience.

Processors involved: Google Inc, Facebook Inc, YouTube Inc, Magyar Hosting, Microsoft Hungary

9.5 CV data

A CV can be sent to the e-mail address provided for the job advertisements published under the “Work with us” menu item on the website, as well as for job advertisements launched at our partners.

The **purpose of the processing** is to fill the position advertised by the Service Provider and to establish an employment relationship. The **legal basis of the processing** is the data subject's voluntary consent to the processing; by sending the CV, the data subject voluntarily consents to the processing of their data. The **personal data processed** are the data subject's name, telephone number, e-mail address, schools attended, and the other data provided in the CV. The **data subjects** affected by the processing are all interested persons who voluntarily apply for the job advertisement. **Consent can be withdrawn** by e-mail or telephone; however, withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal. The data subject is **obliged** to provide the data; the recruitment process cannot be started without the requested data. If the **data subject does not provide the personal data**, the application is automatically rejected. The **storage period** is until the end of the probationary period of the employee hired, but no longer than 6 months.

9.6 Hosting data

Magyar Hosting Kft

The **purpose of the processing** is the maintenance of the Service Provider's own website and of the customer websites it manages, as well as of the Service Provider's e-mail system. The **legal basis of the processing** is the data subject's consent. The data subjects affected by the processing are all customers of the Service Provider who correspond with the Service Provider or who initiate contact on the Service Provider's own website or on the websites of contracted customers. The **data subject** is obliged to provide the data, because identification in the future cannot be carried out without the listed data. If the **data subject does not provide the personal data**, a quotation cannot be given and contact cannot be maintained. The **storage period** is 1 year following the giving of the quotation.

9.7 Customer data / Event participant data

The **purpose of the processing** is the personalised service of the Service Provider's customers, the sending of price quotations at the request of data subjects, and the performance of the contracted activities. The **legal basis of the processing** is the data subject's consent and the conclusion of a contract. The **data subject** is obliged to provide the data, because identification, keeping in contact and the performance of the activities set out in the contract cannot be carried out without the listed data in the future. If the **data subject does not provide the personal data**, a quotation cannot be given, contact cannot be maintained and a contract cannot be concluded. The **storage period** is 6 months following the giving of the quotation.

9.8 Parcel delivery data

The purpose of the processing is parcel delivery at the customer's request. The legal basis of the processing is the data subject's consent. The data subject is obliged to provide the data, because parcel delivery cannot be carried out without the necessary data (the data subject's name, postal address, telephone number). If the data subject does not provide the personal data, the parcel delivery cannot be fulfilled. Consent can be withdrawn after the parcel delivery has been fulfilled; however, the termination of consent does not affect the lawfulness of the processing carried out before the consent was withdrawn. The storage period is 1 year.

9.9 Data processing related to the use of an electronic surveillance system

The Controller operates an electronic surveillance system on the premises of the salon, the purpose of which is to protect the Controller's property, business assets, equipment, tools and stock; to prevent, detect and document possible unlawful acts, damage and offences against property; to protect trade secrets, confidential information, internal operating processes, and personnel and financial data, and to prevent, detect and document any related unauthorised access, use and disclosure; and to secure the evidence necessary for enforcing related claims and for conducting any legal proceedings. The data processed are the image and voice of natural persons present in the area monitored by the electronic surveillance system, as well as other personal data appearing in the recordings that are suitable for identifying the data subjects.

The legal basis of the processing is the legitimate interest under Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR). The Controller's legitimate interest is the protection of the salon's property and business assets, and ensuring the possibility of enforcing claims and providing proof in connection with unlawful acts.

The Controller retains the recordings made by the electronic surveillance system for 72 hours from the time of recording. If, within the retention period, an event, infringement, damage or other circumstance relevant to the enforcement of the Controller's legitimate interest arises, for the proof of which the retention of the recording is necessary, the Controller separates the relevant part of the recording from the general body of recordings and retains it, in line with the purpose to be achieved, only for as long as necessary for the investigation of the specific event, the enforcement of related claims, or use in any official or judicial proceedings. Only persons authorised to do so may access a recording separated in this way. Only persons authorised by the Controller are entitled to view the recordings, and only to the extent and in the cases necessary to achieve the purposes of the processing. The recordings may be transferred to a third party only to comply with a legal obligation, to exercise the data subject's rights, or to enforce or defend the Controller's legitimate claim, in compliance with the relevant legal conditions. The Controller informs data subjects of the use of the surveillance system by a clearly visible warning sign placed before entry to the salon, and by means of this Privacy Policy.

10 Transfer of data abroad or to an international organisation

The Controller does not transfer personal data abroad directly; personal data are stored exclusively in Hungary. If a processor stores or transfers personal data within or outside the European Union, the storage or transfer takes place in the manner required by the GDPR.

11 Rights of the data subject and means of enforcing them

11.1 Right to transparent information

The data subject has a fundamental right to adequate and transparent information, which gives rise to an obligation on the part of the controller. The Controller informs the data subject, in a concise, transparent, intelligible and easily accessible form, in clear and plain language, of the circumstances of the processing and of the rights to which they are entitled.

Where information is requested, we provide it without undue delay, but within 30 days at the latest.

11.2 Right of access

The data subject has the right to obtain feedback from the controller as to whether the processing of their personal data is under way, and, if such processing is under way, the right to access the personal data and the related information, in particular the source of the personal data and whether the data have been transferred to a third party. The controller provides the information within one month at the latest from the submission of the request.

11.3 Right to data portability

The data subject has the right to receive the personal data concerning them, which they have provided to the controller, in a structured, commonly used, machine-readable format, and to transmit those data to another controller.

11.4 Right to rectification

The data subject has the right to have inaccurate personal data concerning them rectified or completed by the controller, at their request, without undue delay.

11.5 Right to erasure ("right to be forgotten")

The controller is obliged to erase personal data concerning the data subject 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;
- the storage period set by the controller has expired
- the data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing;
- the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

Where the processed data are necessary for the enforcement of legal claims or, for example, for accounting to an authority, the processing may continue on the basis of compliance with a legal obligation or legitimate interest.

In the course of erasure, the controller is obliged to inform the processors involved of the obligation to erase.

11.6 Right to object

The data subject has the right to object, at any time, on grounds relating to their particular situation, to the processing of their personal data that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. In the event of an objection, the controller may no longer process the personal data, unless it demonstrates compelling legitimate grounds that override the interests, rights and freedoms of the data subject, or that relate to the establishment, exercise or defence of legal claims.

11.7 Right to restriction of processing

In the case of restriction, personal data may only be stored; any other processing may take place only with the data subject's consent, for the establishment of a legal claim, or in the public interest. The data subject has the right to obtain from the controller, at their request, restriction of processing where one of the following applies.

- the data subject contests the accuracy of the personal data, in which case the restriction applies for a period enabling the verification of the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
- the data subject has objected to the processing; in this case the restriction applies for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

11.8 Automated individual decision-making, including profiling

The Service Provider does not use or carry out profiling, automated decision-making or automated mechanisms.

12 Automated decision-making and profiling

The Service Provider does not use or carry out profiling, automated decision-making or automated mechanisms. The Service Provider does not permit its processors to carry out automated decision-making or profiling either, except where the data subject has given separate written consent to this.

13 Personal data breach, data protection register

The Controller is obliged to notify the competent Authority and the data subjects affected by the personal data breach simultaneously of any personal data breach as soon as possible after becoming aware of it, but within 72 hours at the latest. The Controller will do everything in its power, with the means at its disposal, to reduce the data protection and other damage caused to data subjects as a result of the breach. The Controller is obliged to ensure that similar incidents cannot occur in the future.

The Controller keeps a so-called data protection register of all matters relating to data protection – data subjects' data protection enquiries and any personal data breaches – and, on request, provides information on the contents of the register relating to a given data subject.

14 Recourse to the courts

In the event of a violation of their rights, the data subject may bring an action against the Controller before a court. The court proceeds with the case as a matter of priority. The adjudication of the case falls within the jurisdiction of the regional court (törvényszék). The action may be brought before the regional court having jurisdiction over the controller's registered office or, at the data subject's choice, over the data subject's place of residence or place of stay.

If the Controller causes damage to another person by unlawfully processing the data subject's data or by breaching the requirements of data security, it is obliged to compensate for it. If the Controller infringes the data subject's personality rights by unlawfully processing the data subject's data or by breaching the requirements of data security, the data subject may demand damages for non-pecuniary harm (“sérelemdíj”) from the Controller. The Controller is exempt from liability for the damage caused and from the obligation to pay damages for non-pecuniary harm if it proves that the damage or the infringement of the data subject's personality rights was caused by an unavoidable cause outside the scope of the processing. No compensation is due and no damages for non-pecuniary harm can be claimed to the extent that the damage, or the harm caused by the infringement

of personality rights, resulted from the intentional or grossly negligent conduct of the injured party or the data subject.

15 Official proceedings, lodging a complaint

The data subject may also lodge a complaint with, or request information from, the competent Authority:

- **Name**: Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH)
- **Registered office**: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
- **Postal address**: 1530 Budapest, P.O. Box 5.
- **Mailing address**: 1530 Budapest, P.O. Box 5.
- **Telephone**: +36 (1) 391-1400
- **Fax**: +36 (1) 391-1410
- **E-mail**: ugyfelszolgalat@naih.hu
- **Website**: http://naih.hu

16 Other provisions

Where this Policy does not list a particular data processing activity, we will provide detailed information when the data are collected. The Service Provider discloses personal data to authorities – where the authority has specified the exact purpose and the scope of the data – only to the extent and in the amount that is indispensable for achieving the purpose of the request.