

MiniBUD Ltd. data protection information

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The Service Provider specified in section 1 performs online booking and sales activities on the minibud.hu website (hereinafter: the Website), in the interest of the provision of its door-to-door airport shuttle collection and distribution service (hereinafter: the Service). Please read these general terms and conditions, to familiarize yourself with the details of the Service and the terms and conditions of the contract concluded between you and the Service Provider.

Regarding data processing, the Service Provider (hereinafter: Controller) hereby informs you, as customers using the Service (passengers), people browsing and other visitors to the Website (hereinafter: Users), about the personal data handled by it in connection with the provision of the Service and the operation of the Website, the principles and practices followed regarding the processing of personal data, the organizational and technical measures taken to protect personal data and the methods and opportunities for exercising the rights of data subjects.

The Controller handles the data provided by you, as User, in compliance with the effective provisions of 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, hereinafter: GDPR) and of act CVIII of 2001 on certain issues of electronic retail services and services relating to the information society, and processes such data in accordance with these data processing regulations (hereinafter: the Declaration).

By using the Website, you, as User, accept the provisions of the Declaration, and declare that you provided your personal and other data voluntarily, in possession of the appropriate, related information, and expressly accept that the Controller may use the personal data provided by you for the purposes defined in this Declaration.

1. The Controller’s name and contact information

The name of the Controller: MiniBUD Ltd.

The Controller's registered offices: (H-1185 Budapest, Ferenc Liszt International Airport, Terminal 1, Office E215.

The Controller's email address: info@minibud.hu

The Controller's corporate registration number: 01-09-991638

The Controller's tax number: 25426864-2-43

The Controller's telephone number: +36 1 550 0000

URL: <https://minibud.hu/>

2. The Controller's IT service providers

Hosting service provider:

Name: Sysmon Ltd.

Address: 2162 Órbottyán, Kodály Zoltán utca 4.

E-mail address: info@sysmon.hu

Website: <https://sysmon.hu>

Virtual server operator:

Name: Sysmon Ltd.

Address: 2162 Órbottyán, Kodály Zoltán utca 4.

E-mail address: info@sysmon.hu

Website: <https://sysmon.hu>

Physical server operator:

Name: Invitech Megoldások Plc.

Address: 2040 Budaörs, Edison utca 4.

E-mail address: kapcsolat@invitech.hu

Website: <https://www.invitech.hu/>

3. The processing performed by the Controller on the Website

The Service Provider processes the data of the Users, i.e. the passengers using the Service, in the interest of providing the Service:

Activity	Ordering of the Service
Purpose of data processing	The performance of the Service contract
Source of data	Contracting party, i.e. the passenger
Data subject	Contracting party, i.e. the passenger
Type of data	Name, address, telephone number, e-mail address, flight number, online identifiers (country, IP address, type of browser) , bank card details (name on card, card number, expiry date and security code)
Legal basis for processing	The performance of the contract, in which the data subject, i.e. the passenger, is a contracting party
Affected contract	GTC
Commencement of processing	The submission of the order
End of processing	8 years for accounting data (which are: name, address, telephone number, e-mail address, flight number), online identifiers to be stored for 1 year, bank card data are not stored (the company processing bank card payments stores them for 8 years, as accounting data)
Retention period	Accounting act [online identifiers retention period 1 year]
Location of retention (storage)	Name, address, telephone number, e-mail address, flight number: servers located at the registered offices of the company operating our physical servers Bank card data are stored at the bank card payment company, based on its regulations Online identifiers: on servers located at the registered offices of the hosting service provider
The rights of data subjects	Access, rectification, restriction, objection, data portability, erasure (with the exception of accounting data)
The method of exercising these rights	E-mail, mail, in person
Handover of data	Accounting firm, bank card payment company
Attesting the erasure of transferred data	Recorded in a protocol

Upon the expiry of the processing period, the Controller erases from its records the personal data provided by you for the provision of the Service, drafting a protocol that does not contain personal data.

The Controller shall not be liable for any damages resulting from the incorrectness or the deficiency of the data provided by passengers.

The Controller only hands over your data to the competent authorities or courts upon their request and in the cases prescribed by relevant legal provisions. The Controller shall take all reasonable actions, including warranted technical and safety / security measures, for the protection and safe storage of your personal data, and in order to protect them from unauthorized access, use, alteration or unlawful erasure. The Controller pays particular attention to the safe and secure transfer of personal and financial data. The regulations of the PCI ISS qualification applicable to strict audited systems specify the mandatory period for retaining data, which is the period pursuant to section (1) of paragraph 169 of the Accounting Act, i.e. 8 years following the provision of the Service, as well as the manner of saving and forwarding them.

The Controller does not use or process your personal data for marketing purposes.

You may contact the Controller through the Website at any time. Personal data provided in the interest of contacting the Controller are deleted at the time when the objective of such a contact enquiry is fulfilled, but after 1 year at the latest, or within 30 days of the receipt of the request for the erasure of these data.

The Controller stores online identifiers for the purpose of statistical use for 1 year, unless you request their erasure sooner. The statistics prepared by the Controller do not contain any personal data.

4. 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. 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;

3. 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

4. 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 4.5.2016 EN Official Journal of the European Union L 119/33 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;

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

5. Processing and transfer

In addition to the IT service providers specified in section 2, the Controller commissions an accounting firm and a contact center with processing activities, in connection with the accounting of the services, information provision and the ordering of the services.

Accounting services are provided by the following company:

ZTB Consulting Ltd.

Registered offices: 5400 Mezőtúr, Eper utca 52.

Corporate registration number: 16-09-010192

Tax number: 14364167-2-16

If the user would like to request information or order the service by telephone, calls are handled by Balla Média Ltd.

Balla Média Ltd.

Registered offices: 2615 Csóvár, Madách utca 1.

Corporate registration number: 13-09-193015

Tax number: 14877360-2-13

You, as User (passenger), can pay for the Service online, via the Website. To ensure the safety and security of bank transactions, the Controller transfers bank card data (name on card, card number, expiry date and security code) to the following company dealing with online bank transactions, in compliance with data processing principles:

SIX Payment Services (Europe) S.A. Hungary Branch

Registered offices: 1117 Budapest, Budafoki út 91-93. C. ép. fszt.

Corporate registration number: 01-17-000672

Tax number: 23106554- 2-43

Data protection information: <https://www.six-payment-services.com/classic/en/services/legal/privacy-statement.html>

We inform you that the Controller does not store bank card data, but forwards them to the above company (processor), as soon as they are provided. The manner of data processing is: machine-based data processing. The data processor handles the personal data for the period specified in section (1) of paragraph 169 of the accounting act, in Hungary.

6. Data security measures

The Controller takes the technical and organizational measures and complies with the procedural rules required for the enforcement of the provisions of act CXII of 2011 on information self-determination and the freedom of information and of article 32 of the GDPR. The Controller takes all reasonable measures to protect the User's data from loss, destruction, distortion, falsification, manipulation, unauthorized access and unauthorized publication. The Controller's IT systems are located partly at its

registered offices (client side infrastructure) and partly, regarding the location of data retention, at the server rooms of Invitech Megoldások Plc., the operator of its physical servers (server side infrastructure).

7. The modification of the data processing policy

The Controller reserves the right to unilaterally modify this Declaration. Any change is effective from the time of its appearance on the Website. The Controller does not send separate notification of changes introduced, but specifies the date of the last modification / update in the header of the Declaration.

8. Cookies

During the use of the Website, your browser program stores cookies on the hard disk drive of your computer. The Controller stores the data sent in the course of orders to our website by your browser and computer, so that the data specified during the various stages of ordering should not be lost the next time you visit the site. The Website only installs session cookies and anonymized Google Analytics statistical tracking codes in the User's browser, which are indispensable for the regular operation of the site and important for collecting anonymized data on the number of visitors. Session cookies are automatically deleted at the end of the session, whilst the Google Analytics tracking codes are stored on your computer for 2 years. You can modify the cookie settings at any time, or delete them, in your browser settings.

9. Users' rights relating to the processing of their personal data, legal remedy

In case of the processing of your personal data, you have numerous rights, which you may exercise by way of requests sent to any of MiniBUD Ltd.'s contacts specified in section 1.

The right of access to and rectification of personal data

You are entitled to access your personal data at any time, as well as to request a copy, or the rectification or erasure of your data.

Based on your right of access, you are entitled to request information on the following:

- a) The purposes of processing;
- b) The categories of the personal data affected;
- c) The recipients or the categories of the recipients to whom your personal data were or will be disclosed, including recipients in third countries and international organizations;
- d) The planned duration of the storage of personal data, if relevant;
- e) The right of the data subject to request the controller to rectify, erase or restrict the processing of the personal data, and to object to the processing of such personal data;
- f) The right to submit a complaint addressed to a supervisory authority.

We understand the importance of these rights. Therefore, if you wish to exercise them, please do not hesitate to contact us, using the information specified in section 1.

The right to data portability

Your personal data are portable; you are thus entitled to receive them in a structured, commonly used and machine-readable format. This means that you receive your personal data processed by us in a format readable by computers and able to be transmitted by you electronically to another person.

Please contact us via the information specified in section 1 if you wish to exercise your right to data portability.

The right to erase personal data

You are entitled to request the erasure of your data if

- a) Your personal data are no longer necessary in relation to the purpose(s) for which they were collected; or
- b) The processing has no legal basis; or
- c) You object to the processing of your personal data;
- d) Your personal data are not processed in a lawful manner; or
- e) Your personal data have to be erased for compliance with a legal obligation.

We inform you that in cases when the duration of processing is defined by law, you are not entitled to request the erasure of your data, since we are obliged to preserve them by law.

Based on the above, you may only request the erasure of your online identifiers, cookies and data provided in the interest of the first communication. If you wish to request this, please contact us via the information specified in section 1.

The right to the restriction of processing

You may request the restriction of the processing of your personal data if

- a) You believe that the personal data stored in connection with you are not precise; or
- b) The processing of personal data does not occur lawfully, but instead of requesting their erasure, you would like to restrict their processing; or
- c) Your personal data are no longer necessary in relation to the purpose(s) for which they were collected, but you require these data in order to submit, enforce or defend against a litigious claim; or
- d) You have objected to the processing of your personal data, and are awaiting confirmation of whether your interests relating to the objection overwrite the legal basis for processing.

If you wish to restrict the processing of your personal data, please contact us via the information specified in section 1.

The right of objection

You may object to the procession of your personal data at any time. If you wish to do so, please contact us via the information specified in section 1.

The Controller will respond to your request within the shortest possible time, but within 30 days of the receipt of your request at the latest.

If the exercising of any of your rights is refused, or if you are dissatisfied with the Controller's reply, you may enforce your right to the protection of your personal data in front of the civil courts, and you may turn to the Hungarian National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; mailing address: 1530 Budapest, P. O. box 5., telephone: +36 1 391-1400; email address: ugyfelszolgalat@naih.hu)

Issues not regulated herein shall be governed by the provisions of act CXII of 2011 on information self-determination and the freedom of information, act V of 2013 on the Civil Code, act CVIII of 2001 on certain issues of electronic retail services and services relating to the information society and of government decree no. 45/2014 (II. 26.) on the detailed rules of contracts between consumers and companies.

Last updated: [*]