

RÓMAI KALANDPARK KFT. - PRIVACY POLICY

Római Kalandpark Kft. (189 Szentendrei Road, Budapest 1031 service provider, data controller) as data controller (hereinafter referred to as 'RKP') considers the present statement as binding upon itself. RKP undertakes an obligation that its data processing shall meet the requirements of the present Privacy Policy and the law in force.

Data protection directives related to the data processing by RKP are continuously available on our website. RKP reserves the right to modify this Policy at any time. It shall inform the visitors about any modifications in time. If you have any question, please do not hesitate to contact our customer service on phone number +36-30-615-68-89 or send an e-mail to:

rendezveny@romaikalandpark.hu

RKP is committed to the personal data protection of its users and partners, and considers their right of informational self-determination highly important. RKP shall treat personal data confidentially and takes all safety, technical and organizational measures to guarantee data security.

RKB details its data processing principles below and presents the requirements that it has elaborated and follow as data controller. The principles of data processing are in line with the law in force on data protection, in particular, with the followings:

- Regulation (EU) 2016/679, the General Data Protection Regulation (GDPR)
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information
- Act V of 2013 on the Civil Code
General personality rights protection, specific personality rights
- Act L of 2013 on Electronic information Security of State and Local Government Bodies and Requirements for Specific Technology, Security and Secure Information Tools and on the Requirements of Classifying Them into Security Classes and Security Levels

- 41/2015.(VII.15.) Decree by the Ministry of Interior on the Electronic Information Security of State and Local Government Bodies

Definitions:

- 1.1. *'personal data'* shall mean any data relating to a natural person (identified or identifiable) that can be linked to him (data subject), a conclusion on the data subject deduced from the data.
Personal data retains this quality in the course of data processing as long as a link to the data subject can be restored. A person is considered to be identifiable in particular, if he or she can be identified directly or indirectly by name, identification mark or by one or more factors specific to his physical, philosophical, physiological, mental, economic, cultural or social identity.
- 1.2. *'the data subject's consent'* shall mean any freely and expressly given specific and informed indication of the will of the data subject by which he signifies his agreement to personal data relating to him being processed fully or to the extent of specific operations;
- 1.3. *'the data subject's objection'* shall mean a declaration made by the data subject objecting to the processing of their personal data and requesting the termination of data processing, as well as the erasure of the data processed;
- 1.4. *'controller'* shall mean natural or legal person, or organisation without legal personality which alone or jointly with others determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor; In the present case Római Kalandpark Kft. is data controller and data processor either.

- 1.5. '*data processing*' shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use; Taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification are considered as data processing;
- 1.6. '*data transfer*' shall ensuring access to the data for a specific third party;
- 1.7. '*disclosure*' shall mean ensuring open access to the data;
- 1.8. '*data deletion*' shall mean making data unrecognisable in a way that it can never again be restored;
- 1.9. '*blocking of data*' shall mean marking data with a special ID tag to indefinitely or definitely restrict its further processing;
- 1.10. '*data destruction*' shall mean complete physical destruction of the data carrier recording the data;
- 1.11. '*data process*' shall mean performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data;
- 1.12. '*data processor*' shall mean any natural or legal person or organisation without legal personality processing the data on the grounds of a contract, including contracts concluded pursuant to legislative provisions;
- 1.13. '*third party*' shall mean any natural or legal person, or organisation without legal personality other than the data subject, the data controller or the data processor;

Principles of Data Processing by Romai Adventure Park

Personal data may only be processed with the consent of the data subject.

The consent of the legal guardian is required for that legal statement in case of minors having no or limited capacity to act. Personal data may only be processed for specified purposes. Data processing must meet this objective at all stages. Only personal data essential for the purpose of data processing and suitable for the purpose may only be processed to the extent and for the period that is necessary to achieve the purpose. Personal data may only be processed on the basis of informed consent.

The data subject must be clearly, comprehensibly informed in detail of all facts relating to the processing of his data, in particular, the purpose and legal basis of the data processing, the duration of the data processing and the persons who can access to the data. Information shall include the rights of the data subject on data processing and the remedies available to data subject.

The personal data processed by the Park shall meet the following requirements:

- a., data recording and processing shall be fair and legal
- b., data shall be precise, complete and if necessary, current
- c., the method of their storage shall be suitable for identifying the data subject only as long as it is necessary and for the purpose of storage.

Use of general and common identification sign is prohibited.

Personal data may be transferred and different data processes may be combined only if the data subject consents to it or the law allows it and the conditions of data processing are fulfilled for all personal data.

The Types of Personal Data, the Purpose, Legal Basis and Period of Data Processing

Data processing by Római Kalandpark Kft. is based on the voluntary consent of the data subject.

Purposes of data processing: accident and liability insurance for visitors entering the Park and enforcing rights by the Adventure Park if the visitors do not properly use the Park and its equipment.

Legal basis of data processing: the voluntarily consent of the data subject. (Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information)

Types of data processed: name, address and birth date in the liability waiver form.

Deadline for deleting data: providing that the data subject do not ask for deleting his or her data, they shall be erased until 15 January in the year after recording them.

Data shall not be processed for marketing purposes.

Data of Visitors on the Website of RKP (www.romaikalandpark.hu)

Purpose of data processing: filling in reservation forms which is voluntary. The customer can make reservations faster and more efficiently.

Legal basis of data processing: the voluntarily given consent of the data subject (Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information)

Types of processed data: name, address, e-mail address, date of reservation, and the reserved event (excursions for students, birthday packages, team buildings, registration of individual visitors)

Deadline for deleting data: providing that the data subject do not ask for deleting his or her data, they shall be erased until 15 January in the year after recording them.

The service provider place and read small data packets on the user's computer to provide customised services. If the browser returns a previously saved cookie, the provider using cookies can link the user's current visit to the previous one but only in terms of its own content.

The user can delete cookies from his or her own computer or disable the use of cookies in the browser. Cookies can be managed usually in the browser's Tools/Settings menu under the Privacy settings (referred to as cookies).

On the website of RKP (www.romaikalandpark.hu) you can contact the provider doing webanalytics: www.google-analytics.com

On website www.romaikalandpark.hu web beacons are not used.

Other Data Processing

We will inform you about data processing not listed in this Policy upon data recording.

Judiciary, prosecuting authority, investigating authority, authority dealing with infringements (police, district office, or the National Tax and Customs Office), administrative authority and other authorities authorised by law may request us to inform them or other authorities or disclose, transmit data and provide documents.

In this case, provided the authority specifies the exact purpose of its request and the types of data, RKP will only ensure it personal data to the extent that is necessary to meet the purpose of its request.

The Method of the Storage of Data and the Security of Data Processing

RKP's IT systems and other IT tools for storage of data are located at its seat.

IT tools for processing personal data in the course of providing services will be selected by RKP so that:

- a., the processed data will be available for authorised entities (availability),
- b., its authenticity and authentication will be ensures (authenticity of data processing),
- c., its consistency will be verifiable (data integrity),
- d., it is protected against unauthorised access (data confidentiality).

RKP provides technical and organizational measures to ensure security for data processing that provides risk-appropriate protection for data processing.

RKP shall ensure in the course of data processing the followings:

a., confidentiality: protecting information from unauthorised access,

b., integrity: ensuring precision and completeness of the method of data processing,

c., availability: ensuring access for authorised users whenever they need information and providing tools for it.

The IT system and network of the RKP are both protected against cyber fraud, espionage, sabotage, vandalism, fire and flooding, as well as computer viruses, computer burglary and denial-of-service attacks. The operator ensures server-level and application-level security.

Please note that electronic messages sent over the Internet (e-mail, web, ftp servers, etc.) regardless of protocol are vulnerable to network threats that lead to unfair practices, contract disputes, or disclosure or modification of information. The service provider shall take all feasible precautionary measures to protect the system against such threats. It monitors systems to record any deficiency of security and to provide evidence for all security incidents. Monitoring the system makes possible to check the efficiency of the precautionary measures applied.

Contact of the Data Processor and the Operator

Name: Római Kalandpark Kft.

Seat: 189 Szentendrei Road, Budapest 1031

Company registration number: 01-09-184556

Tax number: 24827737-2-41

E-mail: rendezveny@romaikalandpark.hu

Bank account number: CIB 10700495-68391034-51100005

Contact and Data of the Data Processor

Name: Versanus Informatikai és Szolgáltató Kft.

Seat: 3-5 Bécsi Road, Budapest 1023

E-mail address: support@versanus.eu

The list of data processors is complete.

Remedies

Data subject may request information on the processing of his or her personal data as well as the rectification and the erasure of his or her personal data with the exception of data processing prescribed by law.

RKP shall erase personal data if the processing is unlawful, the data subject requests it, the purpose of data processing has ceased, the statutory deadline for storing data has expired and the judiciary or the data protection commissioner has ordered it.

The data subject may object to the processing his or her personal data if a., the processing (transmission) of personal data is only necessary for the enforcement of the right or legitimate interest of the data controller or the data recipient with the exception of data processing prescribed by law,

b., the use or transmission of personal data is carried out for the purpose of direct marketing, opinion polling or scientific research,

c., the exercise of the right of objection is otherwise permitted by law.

By suspending data processing at the same time, RKP shall examine the objection within 15 days of the submission of it and inform the data subject in writing. If the objection is justified, the data controller shall terminate data processing, including further data collection and transmission, block data and furthermore, inform those to whom personal data were transmitted, and who are obliged to take measures to enforce the right to object. If the data subject disagrees with the decision of the data controller, he or she may appeal to the court within 30 days of its notification.

RKP is not allowed to erase the data of the data subject if data processing has been ordered by law. Data may not be transmitted to data importers if the data controller has agreed with the objection or the court has considered it as legitimate.

The data subject may turn to court if his or her rights are infringed by the data controller. The case will be dealt by court as a matter of priority.

RKP shall compensate for damage caused to others by unlawful process of data or violating the requirements of technical data protection. The data controller is exempted from liability for damage resulting from cause beyond liability for data processing.

The data controller shall not compensate the data subject for the damage resulting from gross negligence or deliberate conduct of the injured party.

Should you have any problem in connection with the data processing of RKP, please turn to the manager of the Park.

You may submit a complaint or an appeal to the Hungarian National Authority for Data Protection and Freedom of Information (Adatvédelmi Hatóság):

According to Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, the authority which is responsible for data protection and has the power to impose fines is the National Authority for Data Protection and Freedom of Information in Hungary.

Address: 22/c Szilágyi Erzsébet Alley, Budapest
1125

Postal address: PO Box 5, Budapest 1530 (1530 Budapest, Pf.:5.)

Phone number: +36 (1)
391-1400

E-mail: ugyfelszolgalat@naih.hu

Website: <https://www.naih.hu/index.html>

Once registered on the website, it is possible to start a case online.

Information: <https://www.naih.hu/online-uegyinditas.html>

Under Section 52 Subsection (1) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information anyone can initiate an investigation by claiming that there has been a violation of his or her rights to access public data or data of public interest or there is a direct risk of such infringement.

Information: <https://www.naih.hu/online-uegyinditas.html>

<https://www.naih.hu/panaszugyintezes-rendje.html>

Please note that under Section 52 Subsection (1) of the above mentioned Act, **the Authority will investigate complaints only if the data subject contacted the data controller before reporting the case: asked for information or data rectification, erasure or restriction.**

The Authority asks the complainants to exercise their rights in a manner that is demonstrable in order to avoid legal disputes. Please ask the data controller explicitly to answer you in writing about your case and the measures taken.