

PRIVACY STATEMENT OF THE RIGHTS OF INDIVIDUALS CONCERNING THE MANAGEMENT OF PERSONAL DATA

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INTRODUCTION

Having regard to the Treaty establishing the European Community, and repealing Regulation 95/46/EK and having regard to Regulation No 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, that the Data Controller shall take appropriate measures to provide the data subject with the personal data management information in a concise, transparent, understandable and easily accessible form, in a clear and unambiguous manner, and that the Data Controller shall facilitate the exercise of the rights of the data subject.

The year 2011 nr. CXII law also provides the obligation to inform the data subject in advance of the information on the right to information self-determination and the freedom of information.

By the information provided below, we comply with this statutory obligation.

The information shall be disclosed on the company's website or sent to the person concerned upon request.

CHAPTER 1. THE DATA CONTROLLER

The publisher of this statement, the Data Controller is:

Name: CW City and Wine Tours GmbH
Address: 1100 Wien, Karl-Popper-Straße 22
Reg. nr.: FN 494653 g
Tax nr.: ATU73573858

Representatives:	Edina Avvakumovits and	Tamas Lovasz
Tel. nr.:	+36 30 526 3872	+36 20 245 6118
E-mail address:	edina@cityandwine.com ,	tamas@cityandwine.com
Website:	www.cityandwine.com	

(hereinafter referred to as "the Company")

CHAPTER 2. DATA PROCESSORS

Data processor: any natural or legal person, public authority, agency or any other body that manages personal data on behalf of the data controller (Regulation 4. paragraph 8.)

The use of the data processor does not require the prior consent of the data subject, but it is necessary to inform him / her. Accordingly, we provide the following information:

1. IT supplier of the Company

Our Company uses a data processor to maintain and manage its website, which provides IT services (hosting services) and manages the personal data provided on the website, for the duration of our contract, with the personal data stored on the server.

This data processor is named as follows:

Name: Levels Media Kft.
Address: 2100 Godollo, Kossuth Lajos utca 11, HUNGARY
Reg. nr.: 23172852-2-18
Tax nr.: HU23172852
Representative: Krisztian Gombos
Tel nr.: +36 20 410 5666
E-mail: gk@levels.hu
Website: www.levels.hu

The reservation system of the Company – which is the ERP – is managed by the same company, Levels Media Kft.:

2. Accountancy of the Company:

For the fulfillment of its tax and accounting obligations, our Company uses an outsourcing service provider with a book-entry contractor to manage the personal data of the Company or its natural persons in connection with the Paying Company, in order to meet our tax and accounting obligations.

This provider is the following:

Name: Safeheaven Steuerberatung GmbH
Address: Blattgasse 4-6/2/9
Tax nr: ATU 68893405
Representative: Timea Fantoly-Schmid
Tel nr: +43 (0) 1 276 7252

CHAPTER 3. DATA PROCESSING IN EMPLOYMENT

1. Labor and personnel records

(1) Workers may only be required to give and keep records, or perform work-related medical aptitude tests that are necessary to establish, maintain and eliminate employment, or provide social-welfare benefits and do not violate the employee's rights.

(2) The employer shall treat the following data of the employee for the purpose of establishing, completing or terminating an employment relationship for the purpose of exercising the legitimate interests of the employer:

1. name
2. name
3. date of birth
4. mother's name
5. address
6. nationality
7. tax number
8. insurance nr,
9. pensioner registration nr (pensioner employer)

10. tel nr
11. e-mail
12. ID card nr,
13. address registration card nr.
14. bank account nr
15. online ID (if exists)
16. employment starting and end date

17. job discription
18. copy of the school or qualification certificate

19. photo
20. CV
21. ammount of the salary, data of the payment of the salary and other benefits
22. the debt to be deducted on the basis of a decision or a law or a written consent of the employee's salary,

23. evaluation of the employee's work
24. the manner and reasons for termination of employment
25. certificate of good-conduct depending on the job
26. summary of the aptitude tests

27. in the case of a pension fund and a voluntary mutual insurance fund membership, the name, identification number and the employee's membership number
28. passport number for a foreign worker; name and number of document certifying work entitlement
29. data recorded in the accidents of an employee
30. the data necessary for the use of welfare services and accommodation
31. the camera and access control system used for security and property protection at the Company and the data recorded by the positioning systems.

- (3) Data on sickness and union membership are handled by the employer only for the purpose of fulfilling the rights or obligations set out in the Labor Code.
- (4) Personal data are addressed to: the employer's head, the practitioner of the employer's right, the employees and data processors of the Company who perform the duties of the human resources.
- (5) Only the personal information of senior employees can be transferred to the owners of the Company.
- (6) Duration of personal data storage: 3 years after termination of employment.
- (7) Before the data is processed, the data subject must be informed that the data processing is based on the Labor Code and the validation of the employer's legitimate interests.

2. Data management related to aptitude tests

- (1) An employee may only be subject to an aptitude test that is required by an employment rule or is required to exercise the right set forth in the employment relationship and to perform the obligation. Before the test, employees should be informed on the skill and capability of aptitude test, the means and method of testing. If legislation requires that the test to be carried out, employees should be informed about the legal title and the exact legal status.
- (2) Tests of workability and preparedness can be filled out by the employee both before the start of the employment and during the employment.
- (3) In order to provide clearer work-related workflow and more efficient workflow, a test sheet that can be used to test psychological or personality traits with a larger group of employees can only be filled if the data that is surfaced in the analysis can not be linked to specific specific employees, that is, anonymous data processing.
- (4) The range of manageable personal data is the fact of the job suitability and the necessary conditions.
- (5) The legal basis for data handling is the employer's legitimate interest.
- (6) The purpose of personal data management is to establish, maintain, have a job.
- (7) Personal Data Addresses or Categories of Recipients: The examination results can be recognized by the investigated workers or the investigator. The employer can only get the information that the person being examined is fit for work or not and what conditions are provided for it. However, the details of the examination or its full documentation are not available to the employer.
- (8) Duration of the processing of personal data: 3 years after termination of employment.

3. Handling data on employees who are applying for admission, applications, curricula vitae

- (1) Personal data can be handled: the name, date of birth, place of birth, mother's name, address, qualification data, photo, phone number, e-mail address, employer's note on the candidate (if any).
- (2) The purpose of personal data management is to apply for a job, to apply for a grant, to conclude a contract of employment with the chosen employee. The person concerned should be informed if the employer has not chosen him for that job.
- (3) Legal Basis for Data Management: Contribution of the Contributor.
- (4) Personal Data Addresses or Categories of Recipients: Employees entitled to exercise employer's rights at the Company, who are employees of labor issues.
- (5) Duration of the storage of personal data: until the application and the application is considered. Personal data of non-selected applicants must be deleted. You must also delete the details of the applicants who withdraw their application.
- (6) The employer may only keep the applications on the basis of the express, explicit and voluntary consent of the concerned party, provided that they are kept in order to achieve their data management objective in accordance with the law. This contribution shall be requested from the candidates after the closing of the recruitment process.

CHAPTER 4. DATA MANAGEMENT RELATED TO CONTRACTS

1. Managing Partner Contact Data - Registering Buyers and Suppliers

- (1) The Company treats the name, birth name, address, tax identification number, tax number, telephone number, e-mail address of the natural person (buyers, passengers, suppliers list, purchase order lists) contracted as a partner, as a passenger, as a supplier, for the performance of a contract (which can be done on-line, on the website of the Company or on a paper basis). This data management is considered legitimate even if the data processing is necessary before the contract is concluded to take action on the request of the person concerned. Personal data are addressed to the employees, representatives, contract partners, accountants, taxpayers, employees, representatives, contract partners and data processors of the Company serving customer service, travel, hospitality and wine tours tasks. The duration of the storage of personal data is 5 years after termination of the contract.
- (2) Before the data is processed, the data subject must be informed that the data processing is based on the performance of the contract (tourism, wine tourism, travel, transportation, etc.), this information may also be provided in the contract.
- (3) The person concerned shall be informed of the transfer of his personal data to the data processor.

2. Contact details of natural persons representing legal persons, customers, passengers, buyers, suppliers

- (1) The range of manageable personal data: the name, address, phone number, e-mail address, online ID of the natural person.
- (2) The purpose of the personal data management is to: fulfill the contract with the partner of a legal person, business relations, legal basis: the consent of the person concerned.

- (3) The recipients of personal data and the categories of recipients are the employees of the Company who are responsible for customer service.
- (4) Duration of personal data storage: 5 years after the business relationship or the quality of the representative concerned.

3. Social media policy/ Data management on the Company's Facebook page

- (1) To maintain and promote the Company's services, it maintains a Facebook page.
- (2) The question on the Facebook page of the Company does not constitute an officially filed complaint.
- (3) The Company does not treat the personal information published by the visitors on the Facebook page of the Company.
- (4) Visitors are subject to the Privacy Policy and Terms of Facebook.
- (5) In the event of publication of antitrust or offensive content, the Company may, without prior notice, exclude a member from the members or delete their comments.
- (6) The Company is not responsible for the content and comments that infringe the law by Facebook users. The Company is not liable for any problems resulting from the operation of Facebook, malfunctions or changes in the functioning of the system.

CHAPTER 5. DATA MANAGEMENT BASED ON LEGAL OBLIGATIONS

1. Data management for tax and accounting obligations

- (1) The Company manages the statutory data of natural persons as buyers, suppliers or partners in the performance of a legal obligation to fulfill statutory tax and accounting obligations. The processed data are based on section 169 and 202 of the CXXVII of 2017 law on Value Added Tax, in particular: tax number, name, address, tax status, according to Section 167 of Act C of 2000 law on Accounting: : name, address, designation of the person or organization providing the transaction, the person who certifies the implementation of the order and the signature of the inspector depending on the organization; on the certificates of stock movements and on cash management documents, the receivables received by the recipient, on the counter-bill signature of the payer, the CXVII of 1995 on Personal Income Tax on the basis of the law: number of entrepreneurial card, number of primary producer, tax identification number.
- (2) The duration of the storage of personal data is eight years after the legal relationship with which the legal basis is terminated.
- (3) Personal data are addressed to the employees and data processors of the Company, which performs tax, accounting, payroll and social security tasks.

2. Payroll Data Management

- (1) The Company manages the personal data of those concerned - employees, their family members, employees and other beneficiaries - who are required to pay their personal data (tax, advance advance, contributions, payroll, social security) 2017: Act CL on the Order of Taxation (Art. 7 § 31). The scope

of the data processed is defined in Article 50 of the Art. special mention of this: the natural person's identity (including the former name and title), gender, nationality, tax identification number of the natural person, Social Security Identification Sign (Social Security Number). If the tax laws have a legal consequence, the Company may manage the data on the employees' health (Personal Income Tax Act § 40) and union (Personal Income Tax Act Section 47 (2) b) membership and the obligation to pay contributions (payroll, social security).

- (2) The duration of the storage of personal data is eight years after the legal relationship with which the legal basis is terminated.
- (3) The personal data are addressed to the employees and data processors of the Company, which performs tax, payroll, social security (paying) duties.

CHAPTER 6. SUMMARY INFORMATION ON THE RIGHTS RESERVED

In this chapter, for the sake of clarity and transparency, we briefly summarize the rights of the person concerned, for which detailed information on how to exercise it is provided in the next section.

Right of prior information

The person concerned has the right to be informed about the facts and information related to data management prior to commencing the processing of data.

(Regulation nr. 13-14 article)

For details, see the next section.

Right of access to the subject

The data subject is entitled to receive feedback from the Data Controller as to whether his/her personal data is being processed and, if such processing is in progress, he/her has the right to have access to their personal information and related information specified in the Regulation.

(Regulation nr. 15 article)

For details, see the next section.

Right to rectification

The data subject shall have the right to rectify any inaccurate personal data that he or she is entitled upon request by the Data Controller without undue delay. Taking into account the purpose of data management, the person concerned has the right to request the addition of incomplete personal data, including by means of a supplementary statement.

(Regulation nr. 16 article)

The right to cancel („the right to be forgotten)

The data subject shall have the right to delete personal data concerning him without undue delay and the Data Handler is obliged to delete personal data of the data subject without undue delay if any of the reasons specified in the Order are in force.

(Regulation nr. 17 article)

For details, see the next section.

Right to Restrict Data Management

The data subject is entitled to request that the Data Controller restricts the processing of data if the specified conditions are met.

(Regulation nr. 18 article)

For details, see the next section.

Notice of obligation to correct or delete personal data or limitation of data management

The Data Handler informs all recipients of all corrections, deletions or restrictions on data management with whom or with which personal information has been communicated, unless this proves impossible or requires disproportionate effort. At the request of the data subject, the Data Controller informs them.

(Regulation nr. 19 article)

The right to data storage

Subject to the terms of this Regulation, the data subject shall have the right to receive personal data provided to him by a Data Controller in a machine-readable, widely used, machine-readable format, and shall be entitled to transmit this data to another Data Manager without thereby hampering, the Data Controller that has provided the personal information.

(Regulation nr. 20 article)

For details, see the next section.

Right to protest

The person concerned has the right to object to his / her personal data at any time for the purposes of his or her own situation on the basis of Article 6 (1) (e) of the Regulation (data processing is necessary for the performance of a public interest or performing a public authority exercise of the public authority) it is necessary to enforce the legitimate interests of the Data Controller or a third party.

(Regulation nr. 21 article)

For details, see the next section.

Automated decision-making in individual cases, including profiling

The data subject shall be entitled to exclude the scope of a decision based solely on automated data management, including profiling, which would have a bearing on him or would have a significant effect on him.

(Regulation nr. 21 article)

For details, see the next section.

Limitations

The law of the Union or of the Member States applicable to the Data Controller or Data Processor may limit legislative measures in Articles 12 to 22 and 34, and Article 12-22 by means of legislative measures in accordance with the rights and obligations set out in Article.

(Regulation nr. 23 article)

For details, see the next section.

Inform the person concerned about the privacy incident

If the privacy incident is likely to pose a high risk to the rights and freedoms of natural persons, the Data Controller informs the data subject of the privacy incident without undue delay.

(Regulation nr. 34 article)

For details, see the next section.

Right to complain to the supervisory authority (right to appeal)

The person concerned has the right to lodge a complaint with a supervisory authority, in particular in the Member State where he or she is habitually resident, in the workplace or in the alleged infringement, if the person concerned considers that the processing of personal data relating to him is in violation of the Regulation.

(Regulation nr. 77 article)

For details, see the next section.

The right to an effective remedy against a supervisory authority

Any natural or legal person is entitled to an effective judicial remedy against a legally binding decision of the supervisory authority or, if the supervisory authority fails to address the complaint or within three months, informs the person concerned of the procedural developments or results of the complaint submitted.

(Regulation nr. 78 article)

For details, see the next section.

Right to an effective remedy against data controller or data processor

Each party is entitled to an effective judicial remedy if it considers that its rights under this Regulation have been infringed because of the inadequate treatment of its personal data under this Regulation.

(Regulation nr. 79 article)

For details, see the next section.

CHAPTER 7.

DETAILED INFORMATION ON THE RIGHTS OF THE PERSON CONCERNED

Right of prior information

The person concerned has the right to be informed about facts and information related to data management prior to commencing the processing of data

A) Information to be provided if personal data is collected from the data subject

1. When personal data relating to the data are collected from the data subject, the data controller shall provide the data subject with the following information at the time the personal data is obtained:
 - a) the data controller and, if any, the identity and contact details of the data controller's representative
 - b) the DPO's contact details, if any
 - c) the purpose of the planned management of personal data and the legal basis for data handling
 - d) in the case of data processing based on Article 6 (1) (f) of the Regulation (legitimate interest enforcement), legitimate interests of the data controller or third party
 - e) where appropriate, the recipients of personal data or the categories of recipients, if any
 - f) where appropriate, the fact that the data controller wishes to transmit the personal data to a third country or to an international organization and the existence or non-existence of a Commission decision on adequacy, or the provisions of Articles 46, 47 or 49 (1) second subpara- graph, the indication of appropriate and suitable warranties and of the means of obtaining copies thereof or of their availability.
2. In addition to the information referred to in point 1, the data controller shall inform the data subject of the following additional information at the time of the acquisition of personal data in order to ensure fair and transparent data management:
 - a) the duration of the storage of personal data or, where this is not possible, the criteria for determining that period
 - b) the right of the data subject to apply to the data controller to access, correct, delete or restrict the personal data concerning him or her, and to object to the handling of such personal data and the right to access the data concerned
 - c) the right to withdraw consent at any time in the case of data handling based on Article 6 (1) (a) of the Regulation (consent of the party concerned) or Article 9 (2) (a) (consent of the party concerned) the lawfulness of the data processing performed on the basis of the consent before withdrawal
 - d) the right to lodge a complaint addressed to the supervisory authority

- e) whether the provision of personal data is based on legal or contractual obligations or is a prerequisite for the conclusion of a contract and whether the data subject is obliged to provide personal data and what the possible consequences of the lack of data provision
 - f) the fact of the automated decision making referred to in Article 22 (1) and (4) of the Regulation, including profiling, and at least in such cases, the logic used and the intelligible information on the significance of such data handling and the expected consequences
3. If the data controller wishes to perform further data processing for purposes other than the purpose for which they are collected, personal data must be communicated to the party concerned by this different purpose and the relevant additional information referred to in paragraph 2 before further data processing.
 4. Points 1 to 3 shall not apply if and to what extent the person concerned already has the information (Regulation nr. 13 article)

B) Information to be made available if the personal data was not obtained from the data subject

1. If personal data is not obtained from the data subject, the data controller shall provide the data subject with the following information:
 - a) the data controller and, if any, the identity and contact details of the data controller's representative
 - b) the DPO's contact details, if any
 - c) the purpose of the planned management of personal data and the legal basis for data handling
 - d) the categories of personal data concerned
 - e) the recipients of personal data or the categories of recipients, if any
 - f) Where appropriate, the fact that the data controller wishes to transmit personal data to a recipient in a third country or to an international organization, or to the existence or absence of a Commission decision on adequacy, or Articles 46, 47 or 49 (1) second subparagraph, the indication of the appropriate and suitable guarantees and the means of obtaining copies thereof or reference to their availability.
2. In addition to the information referred to in point 1, the data controller shall provide the data subject with the following additional information necessary to ensure fair and transparent data management for the data subject concerned:
 - a) the duration of the storage of personal data or, where this is not possible, the criteria for determining that period
 - b) if the data processing is based on Article 6 (1) (f) (legitimate interest) of the Regulation, on the legitimate interests of the data controller or third party
 - c) the right of the data subject to apply for access, rectification, cancellation or management of personal data relating to the data controller and to object to the processing of personal data and his right to data storage
 - d) the right to withdraw consent at any time in the case of data handling based on Article 6 (1) (a) of the Regulation (consent of the party concerned) or Article 9 (2) (a) (consent of the party concerned) the lawfulness of the data processing performed on the basis of the consent before withdrawal
 - e) the right to lodge a complaint addressed to a supervisory authority
 - f) the source of personal data and, where applicable, whether the data originates from publicly available sources
 - g) the fact of the automated decision making referred to in Article 22 (1) and (4) of the Regulation, including profiling, and, at least in such cases, the logic used and the understandable information on the significance of such data handling and the expected consequences
3. The data controller shall provide the information specified under points 1 and 2 as follows:
 - a) taking into account the specific circumstances of the handling of personal data, within a reasonable time after the receipt of the personal data but no later than one month
 - b) if personal data is used for contact with the person concerned, at least when the first contact with the person concerned is in contact

- c) if it is expected that the data will be communicated with another address, no later than the first time when the personal information is communicated
- 4. If the data controller wishes to provide further data processing for personal purposes other than the purpose for which they are acquired, he / she shall inform the data subject of this different purpose and any relevant additional information referred to in point 2 before further data processing.
- 5. Referring to Figures 1-5, point shall not apply where and to the extent:
 - a) the person concerned already has the information
 - b) the provision of the information in question would prove impossible or would require disproportionate effort, in particular for purposes of public interest archiving, for scientific and historical research purposes or for statistical purposes, in the case of data processing in the light of the conditions and guarantees provided for in Article 89 (1) of the Regulation, or the obligation referred to in paragraph 1 of this Article would likely make it impossible or seriously jeopardize the attainment of the purposes of this data management. In such cases, the data controller must take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including making the information publicly available
 - c) the acquisition or disclosure of the data is expressly provided by the law of the Union or of the Member States applicable to the data controller which provides for appropriate measures to protect the legitimate interests of the data subject
 - d) the confidentiality of personal data on the obligation of professional secrecy imposed by an EU or national law, including the obligation of confidentiality based on the law.
(Regulation nr. 14 article)

Right of access to the subject

1. You are entitled to receive feedback from the Data Controller as to whether your personal data is being processed and, if such processing is in progress, you have the right to access personal information and the following information:
 - a) the purposes of data management
 - b) the categories of personal data concerned
 - c) the categories of recipients or recipients with whom or which personal data will be communicated or disclosed, including, in particular, third country recipients or international organizations
 - d) where appropriate, the intended duration of the storage of personal data or, where this is not possible, the criteria for determining that period
 - e) the right of the data subject to apply for rectification, deletion or limitation of the personal data of the Data Controller and to object to the handling of such personal data
 - f) the right to lodge a complaint addressed to a supervisory authority
 - g) if the data is not collected from the person concerned, all available information about the source
 - h) the fact of the automated decision making referred to in Article 22 (1) and (4) of the Regulation, including profiling, and at least in such cases the logic used and the understandable information on how such data are relevant and how expected consequences.
2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the corresponding guarantees provided for in Article 46 of the Regulation.
3. The Data Controller shall provide the data subject with a copy of the personal data subject to data processing. For additional copies requested by the data subject, the Data Manager may charge a reasonable fee based on administrative costs. If the application has been submitted electronically, the information should be provided in a widely used electronic format, unless otherwise requested by the

person concerned. The right to request a copy should not adversely affect the rights and freedoms of others. (Regulation nr. 15 article)

The right to cancel („the right to be forgotten”)

1. The data subject shall have the right to delete the personal data relating to him, without undue delay, and the Data Handler is obliged to delete the personal data of the data subject without undue delay if one of the following reasons exists:
 - a) personal data is no longer needed for the purpose from which they were collected or otherwise handled
 - b) the person concerned withdraws the consent of the data controller pursuant to Article 6 (1) (a) or Article 9 (2) (a) of the Regulation and there is no other legal basis for data processing
 - c) the data subject is objecting to Article 21 (1) of the Regulation and has no prior legitimate reason for data handling or the data subject is objecting to data handling pursuant to Article 21 (2)
 - d) the personal data was unlawfully handled
 - e) the personal data must be removed for the legal obligation provided for in the EU or Member States' law applicable to the Data Handler
 - f) the collection of personal data was made in connection with the offering of information society services as referred to in Article 8 (1) of the Regulation
2. If the Data Controller has disclosed personal data and is required to cancel it under Section 1 above, taking reasonable steps, including technical measures, to take into account the available technology and implementation costs in order to inform the Data Managers handling the data, concerned requested the deletion of copies of such personal data or of the duplicate or duplicate of such personal data
3. Points 1 and 2 shall not apply where data processing is required:
 - a) with a view to exercising the right to freedom of expression and information
 - b) for the fulfillment of an obligation under EU or Member State law applicable to the Data Controller for the processing of personal data and for the performance of a task carried out in the exercise of public authority exercised in the public interest or in the exercise of a public authority exercised on the Data Controller
 - c) in accordance with Article 9 (2) (h) and (i) and Article 9 (3) of the Regulation on the public interest in the area of public health
 - d) in accordance with Article 89 (1) of the Regulation, for purposes of public interest archiving, for scientific and historical research purposes or for statistical purposes, where the right referred to in point 1 would likely make it impossible or seriously compromise this data management
 - e) to present, enforce or protect legal claims(Regulation nr. 17 article)

Right to Restrict Data Management

1. The data subject is entitled to request that the Data Controller restricts the processing of data if one of the following is met:
 - a) the person concerned disputes the accuracy of the personal data, in this case the restriction concerns the period of time that the Data Controller can check the accuracy of the personal data
 - b) data processing is illegal and the data subject is opposed to the deletion of the data and instead asks for their use restriction
 - c) the Data Handler no longer needs personal data for data processing, but the claimant requires them to submit, enforce or protect legal claims
 - d) the person concerned objected to data handling pursuant to Article 21 (1) of the Regulation; in this case, the restriction applies to the duration of determining whether the Data Manager's legitimate reasons prevail over the legitimate grounds of the party concerned

2. If the processing of data is subject to limitation under point 1, such personal data may only be disclosed with the consent of the person concerned or with the submission, claim or protection of legal claims or protection of the rights of a natural or legal person, important public interest.
3. The Data Controller informs the data subject at whose request it has limited the processing of data according to point 1, prior to informing the dissolution of the data management restriction.
(Regulation nr. 18 article)

The right to data storage

1. The data subject shall have the right to receive personal data provided to him by a Data Controller in a machine-readable, widely used, machine-readable format and shall be entitled to transfer this data to another Data Controller without being obstructed by the Data Controller whose the personal information was provided to you if:
 - a) the processing of data is based on a contract within the meaning of Article 6 (1) (a) or Article 9 (2) (a) of the Regulation or under Article 6 (1) (b), and
 - b) data management is done automated
2. In exercising the right to carry the data pursuant to point 1, the data subject is entitled to request the direct transfer of personal data between Data Managers, if technically feasible.
3. The exercise of this right shall be without prejudice to Article 17 of the Regulation. This right does not apply in the case where it is necessary to carry out a task in the public interest or in the exercise of its public authority powers conferred on the Data Controller.
4. The right referred to in point 1 shall not adversely affect the rights and freedoms of others. (Regulation nr. 20 article)

Right to protest

1. The person concerned has the right to object at any time to his / her personal data for the purposes of his / her personal situation on the basis of Article 6 (1) (e) of the Regulation (data processing is necessary for the performance of a public interest or exercise of a public authority exercised on the Data Handler) or f) data handling for the purpose of enforcing the legitimate interests of the Data Controller or a third party), including profiling based on those provisions. In this case, the Data Controller may not process the personal data unless the Data Controller proves that the data processing is justified by compelling reasons of lawfulness that prevail over the interests, rights and freedoms of the data subject, or for the submission, enforcement or protection of legal claims related.
2. If your personal data is handled for direct business, the person is entitled to object at any time to the handling of personal data relating to that purpose, including profiling, if it is related to direct business acquisition.
3. If a person objects to the personal data being handled for direct business purposes, personal data may no longer be handled for that purpose.
4. The rights referred to in points 1 and 2 shall be explicitly mentioned in the first contact with the person concerned at the latest and the information in that regard shall be clearly and completely separate from any other information.
5. With respect to the use of information society services and by derogation from Directive 2002/58 / EC, the right of protest may be exercised by automated means based on technical specifications.

6. If personal data are processed for scientific and historical research purposes or for statistical purposes in accordance with Article 89 (1) of the Regulation, the data subject shall have the right to object to the processing of personal data relating to his personal data, for the purpose of carrying out a task for public interest purposes.
(Regulation nr. 21 article)

Automated decision-making in individual cases, including profiling

1. The data subject shall be entitled to exclude the scope of a decision based solely on automated data management, including profiling, which would have a bearing on him or would have a significant effect on him.
2. Point 1 shall not apply where the decision is:
 - a) it is necessary to conclude or complete a contract between the data subject concerned and the Data Controller
 - b) is made available to the Data Controller by Union or Member State law which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
 - c) based on the express consent of the person concerned
3. In the cases referred to in points 2 (a) and (c), the Data Controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention, submit an objection to a decision.
4. The decisions referred to in paragraph 2 may not be based on the particular categories of personal data referred to in Article 9 (1) of the Regulation, unless Article 9 (2) (a) or (g) applies and the rights, freedoms and appropriate measures have been taken to protect their legitimate interests. (Regulation nr. 22 article)

Limitations

1. The law of the Union or of the Member States applicable to the Data Controller or Data Processor may limit legislative provisions in Articles 12-22. Article 34 and Article 12-22. the rights and obligations set out in Article 5 if the restriction respects the essential content of fundamental rights and freedoms and is necessary and proportionate to safeguard the following in a democratic society:
 - a) national security
 - b) home defense
 - c) public safety
 - d) investigation, detection or prosecution of criminal offenses or the enforcement of criminal penalties, including the protection against threats to public security and the prevention of such threats
 - e) the general objectives of the general interest of the Union or of a Member State, in particular the important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation issues, public health and social security
 - f) judicial independence and the protection of court proceedings
 - g) the prevention, investigation, detection and prosecution of ethical offenses in regulated professions
 - h) in the cases referred to in points (a) to (e) and (g), whether auditing, investigating or regulating the performance of public authority tasks,
 - i) the protection of the person concerned or the protection of the rights and freedoms of others
 - j) enforcement of civil claims.
2. The legislative measures referred to in point 1 shall contain, where appropriate, detailed provisions at least:
 - a) for data management or for data management categories
 - b) the categories of personal data
 - c) the scope of the restrictions imposed

- d) guarantees of misuse or unauthorized access or transmission
- e) to define the Data Manager or to define the categories of Data Managers
- f) the duration of the data storage and the applicable warranties, taking into account the nature, scope and objectives of data management or data management categories
- g) the risks to the rights and freedoms of those concerned, and
- h) the right of the parties concerned to be informed of the restriction, unless this may adversely affect the purpose of the restriction. (Regulation nr. 23 article)

Inform the person concerned about the privacy incident

1. If the privacy incident is likely to pose a high risk to the rights and freedoms of natural persons, the Data Controller informs the data subject of the privacy incident without undue delay.
2. The information referred to in point 1, to the data subject concerned, shall be clearly and concisely disclosed as to the nature of the data incident and shall include at least the information and measures referred to in Article 33 (3) (b), (c) and (d) of the Regulation.
3. The person concerned shall not be informed as referred to in point 1 if either of the following conditions is met:
 - a) the Data Controller has implemented appropriate technical and organizational protection measures and applies these measures to data covered by the data protection incident, in particular measures such as the use of encryption that make it impossible for persons who are unauthorized to access personal data to
 - b) after the data protection incident, the Data Controller has taken further measures to ensure that the high risk referred to in point 1 is no longer likely to be caused by the rights and freedoms of the data subject
 - c) the information would require disproportionate effort. In such cases, the parties concerned should be informed by means of publicly disclosed information or by taking similar measures to ensure that such persons are equally informed
4. If the Data Controller has not yet notified the data subject of the privacy incident, the supervisory authority may, after considering whether the privacy incident is likely to pose a high risk, may order the person concerned to be notified or may establish one of the conditions referred to in point 3. (Regulation nr.34 article)

The right to complain to the supervisory authority

1. Without prejudice to other administrative or judicial remedies, all persons are entitled to lodge a complaint with a supervisory authority, in particular in the Member State of habitual residence, place of work or suspected infringement, if the person concerned considers that the personal data relating to him or her have been infringed this Regulation.
2. The supervisory authority to which the complaint has been filed shall inform the client of the procedural developments and the outcome of the complaint, including that under Article 78 of the Regulation, the client is entitled to a judicial remedy (Regulation nr.77 article)

The right to an effective remedy against a supervisory authority

1. Without prejudice to other administrative or non-judicial remedies, all natural and legal persons shall be entitled to effective judicial remedies against the legally binding decision of the supervisory authority.
2. Without prejudice to any other administrative or non-judicial remedies, any person concerned shall be entitled to an effective remedy if the supervisory authority competent under Article 55 or 56 does not deal with the complaint or within three months does not inform the data subject in accordance with Article 77 or the outcome of a complaint concerning a complaint filed.
3. The procedure against the supervisory authority shall be initiated before the courts of the Member State in which the supervisory authority is situated.

4. If a supervisory authority commits a decision against which a body has previously issued an opinion or made a decision under the unity mechanism, the supervisory authority shall send that opinion or decision to the court.
(Regulation nr. 78 article)

Right to an effective remedy against data controller or data processor

1. Without prejudice to any available administrative or non-judicial remedies, including the right of appeal under Article 77 of the Regulation to a complaint to a supervisory authority, all the persons concerned shall be entitled to an effective judicial remedy if they consider that their personal data have been infringed in accordance with this Regulation.
2. The data controller or processor shall be initiated before the court of the Member State in which the data controller or the processor is established. Such proceedings may be instituted before the courts of the Member State in which the person concerned is habitually resident, unless the data controller or the data processor is a public authority of a Member State acting under his public authority. (Regulation nr. 79 article)

CHAPTER 8.

PRESENTATION OF ANY REQUESTED APPLICATION, DATA MANAGER'S MEASURES

1. The Data Controller shall, without undue delay, but in any event within one month of receipt of the request, inform the data subject of any action taken in connection with his or her claim to exercise his / her rights.
2. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by two additional months. The Data Manager shall inform the person concerned of the extension of the deadline by indicating the reasons for the delay.
3. If the application concerned is submitted electronically, the information should be provided electronically, as far as possible, unless otherwise requested by the data subject.
4. If the Data Controller fails to take action upon the request of the concerned party, he shall inform the data subject without delay and within one month of the receipt of the request for reasons of non-action and whether he may file a complaint with a supervisory authority and exercise his right of judicial redress.
5. The Data Controller provides information and information about the rights and obligations of the Regulation pursuant to Articles 13 and 14 (Articles 15 to 22 and 34) and measures free of charge. If the claim is clearly unfounded or excessive, in particular its repetition, the Data Controller, subject to the provision of the requested information or information or the administrative costs of the requested action:
 - a) can charge 6.350, -Ft fees, or
 - b) may refuse to take action on the application.Evidence of a manifestly unfounded or excessive nature of the claim is borne by the Data Controller.
6. If the Data Controller has reasonable doubts about the identity of the natural person who submits the request, he may request additional information to confirm the identity of the person concerned.

CW City and Wine Tours GmbH

1st September, 2018