

# Privacy statement

The Data Controller hereby informs the Data Subjects about the personal data processed by the Data Controller in connection with the registration, application and data processing necessarily associated with the use of [joga.e-presence.hu](http://joga.e-presence.hu) as a website, the purpose of the processing, the retention period, the storage and transmission of the data, the principles and practices of the processing of personal data, as well as the means and possibilities of exercising the rights of the Data Subjects.

The Data Controller reserves the right to unilaterally amend this document at any time.

## 1. Why has this document been produced?

Because it is required by law!

The GDPR, i.e. Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND OF THE COUNCIL, Articles 12-14, and Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information, which define who the data subjects are and what they need to be informed about.

## 2. Who is this document for?

For you, who visit the website, who register because you want to apply for our programmes, you are the Data Subject, the User.

## 3. Who is producing this document?

I am the data controller: Mónika Bodolai (hereinafter referred to as the "Data Controller"), because we have created the website Iyengar Yoga with Mónika Bodolai ([joga.e-presence.hu](http://joga.e-presence.hu)), where you can register and sign up for our programs, so it is necessary to inform you about the data processing carried out here.

The data controller of the data published on the website is Mónika Bodolai, as data controller:

Address: 3300 Eger, Bartakovics Béla u. 24.

Tax number: 72793453-1-30

E-mail address: [bodolai.monika@gmail.com](mailto:bodolai.monika@gmail.com)

## 4. Data processing during the use of the Website

### 4.1. Registration

The Data Controller draws the attention of the Data Subjects to the fact that the application on the website is subject to prior registration, but after registration the application is not mandatory.

Please note that only one registration per e-mail address is allowed. The Data Controller reserves the right to delete any registration that is manifestly incorrect or false and, in case of doubt, to verify the authenticity of the data provided. Please note that in order to finalize the registration (to prevent registrations with incorrect or erroneous data), the system will send an automatic e-mail to the e-mail address provided, in which the Data Subject can validate his/her registration by clicking on the link provided.

The Data Controller draws your attention to the fact that all responsibility for the accuracy and timeliness of the data rests with the Data Subjects. In this regard, we ask you to update the data recorded in your account if there are any changes to your personal data. Following the modification of the data, the system will send an automatic confirmation email to the registered email address, allowing the Data Subject to finalise the modification of their data.

Purpose of the processing: to carry out the registration required to apply for a job on the website.

Legal basis for processing: the data subject's voluntary, informed, explicit consent, which the User gives by ticking the checkbox during registration, based on the information contained in this document. Article 5 (1) (a) and Article 6 (1) (a) of the GDPR).

Data processed: first and last name, email address.

Data retention period: until the withdrawal of the data subject's consent, until the definitive deletion of the user's account, which the user can do on the [user profile](#) page or by request to the contact details of the Data Controller specified in point 3, or until the deletion of the registration by the Data Controller of the registration that is manifestly erroneous or false.

Place of processing: IT tools located on the premises of the processor.

Data storage method: electronic.

Data transfer: no data transfer will take place.

Data processor: Linux Szerver Kft.; 3300 Eger, Garay u. 5.; Company registration number: 10 09 032003

The data processing activity carried out by the data processor: hosting.

Possible consequences of not providing the data: it is not possible to apply on the website without registration.

#### 4.2. Registration on the website

Users are required to register in advance in order to register on the website.

Purpose of processing: processing of the User's registration on the website: logging in, cancellation of registration.

The legal basis for processing is the indication of the intention to apply or the cancellation of the application. No contract or other legal transaction or legal obligation arises from the application.

Scope of the data processed: surname and first name.

Data retention period: until the withdrawal of the data subject's consent, until the definitive deletion of the user's account, which the user can do on the [user profile](#) page or by request to the contact details of the Data Controller specified in point 3, or until the deletion of the registration by the Data Controller of the registration that is manifestly erroneous or false.

Place of processing: IT tools located on the premises of the processor.

Data storage method: electronic.

Data transfer: no data transfer will take place.

Data processor: Linux Szerver Kft.; 3300 Eger, Garay u. 5.; Company registration number: 10 09 032003

The data processing activity carried out by the data processor: hosting.

Possible consequences of not providing the data: it is not possible to apply on the website without registration.

#### 4.3. Newsletter, direct marketing

We do not send newsletters or engage in direct marketing.

#### 4.4. Cookies

The Data Controller hereby informs the User that when downloading certain parts of the website, the web server automatically places small data files, so-called cookies, on the User's device, and then reads them back during the subsequent visit. In some cases, these data files are considered personal data under the Infotv. and GDPR, as the browser returns a previously saved cookie, and the cookie management service

provider has the possibility to link the User's current visit to previous visits, but only with regard to its own content.

The purpose of data processing: to identify and distinguish users, to connect the browser and the website, to operate the website properly, to enhance the user experience. The User can accept or reject the use of cookies or reject all cookies by setting the browser appropriately, but without the use of cookies, registration is not possible.

Legal basis for processing: the data subject's consent, which the User gives by clicking on the "*You consent to the use of cookies...*" checkbox during registration, based on the appropriate information contained in this notice. 5 (1) a) and Article 6 (1) a) of the GDPR).

Data processed: e-mail, token, date, time.

Data storage method: electronic.

Data transfer: no data transfer will take place.

#### 4.5. Information about the use of the Website as a website

Although we are of the opinion that the data obtained by the Data Controller in the course of the processing described in this point do not constitute personal data, in order to provide full information, we wish to record that the Data Controller collects and stores statistical information in its own system in an aggregated form, by means of logging, on the activities of the Data Subject, which is not suitable for the identification of the user. The log includes, but is not limited to, the IP address of the computer of the Data Subject's user, the time of use and the user activity. The Data Controller shall not disclose this data to third parties and may use the contents of the log solely for its own analytical purposes, to improve the user experience and for the technical development of its IT system.

### 5. Data security

The Data Controller respects the provisions on the security of personal data, so both the Data Controller and the authorised data processor shall take all technical and organisational measures and establish the procedural rules necessary to enforce the provisions of the GDPR on confidentiality and security of data processing.

The Data Controller shall take appropriate measures to protect the data processed by it against unauthorised access, alteration, disclosure, transmission, disclosure, deletion or destruction, as well as against accidental destruction or damage.

The Data Controller shall retain in the course of its processing:

1. confidentiality: it protects information so that only those who are entitled to it have access to it;
2. integrity: it protects the accuracy and completeness of the information and the method of processing;
3. availability: ensuring that when the authorised user needs it, he or she can actually access the information and has the means to do so.

The Data Controller shall adequately protect its information technology systems and networks against computer fraud, espionage, fire and flood, viruses and computer intrusions. The Operator shall ensure security through server-level and application-level protection procedures. The Operator monitors its systems in order to record and provide evidence of any security incidents. System monitoring also allows the effectiveness of the security measures in place to be verified. The compliance of the information security measures applied by the Data Controller is required and monitored by the Data Controller on the basis of the provisions of the contracts concluded with the data processors it uses.

## 6. Rights of data subjects and enforcement

All personal information provided by the Data Subject to the Controller must be true, complete and accurate in all respects.

The data subject may request information on the processing of his or her personal data, and may request the rectification, erasure or withdrawal of his or her personal data, except for mandatory data processing, and may exercise his or her right to data portability and objection in the manner indicated when the data were collected, or by contacting the controller at the above contact details.

Right to information: The Data Controller shall take appropriate measures to provide data subjects with all the information referred to in Articles 13 and 14 of the GDPR and all the information referred to in Articles 15 to 22 and 34 of the GDPR relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language.

The right to information may be exercised in writing using the contact details indicated in point 2 of this notice. The data subject may also be provided with information orally at his or her request, after verification of his or her identity.

The data subject's right of access: the data subject has the right to obtain from the controller information as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom or which the personal data have been or will be disclosed, including in particular recipients in

third countries or international organisations; the envisaged period of storage of the personal data; the right to rectification, erasure or restriction of processing and the right to object; the right to lodge a complaint with a supervisory authority; information on the data sources; the fact of automated decision-making, including profiling, and clear information on the logic used and the significance of such processing and its likely consequences for the data subject. In the case of transfers of personal data to third countries or international organisations, the data subject is entitled to be informed of the appropriate safeguards for the transfer.

The Data Controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee in line with the administrative costs. At the request of the data subject, the controller shall provide the information in electronic form. The controller shall provide the information within a maximum of one month of the request.

Right of rectification: the data subject may request the correction of inaccurate personal data concerning him or her processed by the Controller and the completion of incomplete data.

Right to erasure: The data subject shall have the right to obtain from the Data Controller, upon his or her request, the erasure of personal data relating to him or her 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 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 in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- personal data are collected in connection with the provision of information society services

The erasure of data may not be initiated if the processing is necessary: for the exercise of the right to freedom of expression and information; for compliance with an obligation under Union or Member State law to process personal data or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; for public health purposes or for archiving, scientific or historical research purposes or statistical purposes in the public interest; or for the establishment, exercise or defence of legal claims.

Right to restriction of processing: at the request of the data subject, the Controller shall restrict processing if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies for a period of time which allows the accuracy of the personal data to be verified;
- the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- 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.

Where processing is restricted, personal data, other than storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State. The Controller shall inform the data subject in advance of the lifting of the restriction on processing.

Right to data portability: the data subject has the right to obtain the personal data concerning him or her which he or she has provided to the controller in a structured, commonly used, machine-readable format and to transmit these data to another controller.

Right to object: the data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data 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 necessary 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 there are compelling legitimate grounds for doing so which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing. In the event of an objection to the processing of personal data for direct marketing purposes, the data shall not be processed for those purposes.

Automated decision-making in individual cases, including profiling: the data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right does not apply if the processing:

- necessary for the conclusion or performance of a contract between the data subject and the controller;
- is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- is based on the explicit consent of the data subject.

Right of withdrawal: the data subject has the right to withdraw his or her consent at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

Procedural rules: The controller shall inform the data subject of the action taken on the request pursuant to Articles 15-22 GDPR without undue delay and in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months.

The data controller shall inform the data subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If the data subject has made the request by electronic means, the information shall be provided by electronic means, unless the data subject requests otherwise.

If the controller fails to act on the data subject's request, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

The Data Controller shall provide the requested information and data free of charge. Where the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may, taking into account the administrative costs of providing the information or information requested or of taking the action requested, charge a reasonable fee or refuse to act on the request.

The controller shall inform any recipient to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing that it



has carried out, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of these recipients.

The data controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. If the data subject has made the request by electronic means, the information shall be provided in electronic format unless the data subject requests otherwise.

Compensation and damages: any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for damage caused by the processing only if it has failed to comply with the obligations expressly imposed on processors by law or if it has disregarded or acted contrary to lawful instructions from the controller.

Where more than one controller or more than one processor, or both controller and processor, are involved in the same processing and are liable for the damage caused by the processing, each controller or processor is jointly and severally liable for the total damage.

The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

Data protection authority procedure: the data subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information about the processing of his or her personal data:

Name: National Authority for Data Protection and Freedom of Information

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Postal address: 1530 Budapest, Pf.: 5.

Phone: 06 1 391-1400

Fax: 06 1 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <http://www.naih.hu>

Right to bring a case to court: the data subject may bring a case against the controller before a court in the event of a breach of his or her rights, regardless of whether or not a complaint has been lodged. The court shall rule on the case out of turn.

## 7. Contact us

If the User wishes to contact the Data Controller, he/she may do so through the contact details of the Data Controller set out in point 3 of this notice.