

Data protection information

for data subjects participating in travels and persons partaking in the organisation of travels, who are involved in this process in accordance with the provisions of the General Data Protection Regulation of the European Union - GDPR - (Regulation 2016/679 of the European Parliament and of the Council (EU))

Data Controller:

ALTAGRA Business Services and Travel Agency Ltd;

Head office: 1141 Budapest, 109 Cinkotai st ground floor 4.

International tax number: HU11886747

Company registration number: Cg. 13-09-082901

Name of data controller's representative: Andrea Vándor, Managing Director

Contact details of the data controller's representative:

E-mail: andrea.vandor@altagra.hu;

Telephone: +36 30 4025 716

INTRODUCTION

ALTAGRA Business Services and Travel Agency Ltd. (hereinafter referred to as the "Company"), as the Data Controller, has prepared this Privacy Notice (hereinafter referred to as the "Notice") in order to provide detailed information during its travel organisation activities to Passengers and to persons otherwise assisting Passengers in the organisation of the trip or in the performance of the travel contract as set out, who are involved in the travel organisation process (hereinafter referred to as "the Subjects"). The Company, as Data Controller, shall provide information on the scope of its data processing, the method, purpose and legal basis of data processing, as well as on the safeguarding of the constitutional principles of data protection, the requirements of data security, the prevention of unauthorized access to the personal data of the Subjects, the prevention of alteration and unauthorized disclosure or use of the data. Among the aforementioned, the Company declares that the Prospectus is in compliance with the valid and applicable data protection legislation, in particular the Info. Act and the Regulation 2016/679 of the European Parliament and the Council of 27 April 2016.) on the protection of the processing and free movement of personal data of natural persons, and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter "GDPR"), and will process personal data solely in accordance with the provisions of this Prospectus and the Company's Privacy and Data Security Policy (hereinafter "Privacy Policy"), which contains the details of the processing.

1. TYPE OF DATA PROCESSING

1.1 Information for Data Subjects who are in contact with the Data Controller

Scope of data subjects	Purpose of data processing	Legal basis	Consequence of not providing data
a) Natural persons who have concluded a travel contract with the Data Controller (including: self-employed persons, individuals who issue invoices)	Ensuring the performance of the contract between the Data Controller and the Data Subject and proof of performance	Article 6(1)(b) GDPR	Prerequisite for the performance of the contract
b) Individual Travellers (mainly foreign) who engage a domestic or foreign legal person/travel agency for the purpose of travelling to Hungary and for which the Data Controller acts as Data Controller, mainly as Data Processor	Ensuring the performance of the Data Subject's travel contract between the Data Controller and the Contracting legal person	Article 6(1)(a) GDPR	The Data Subject has given consent to the Agent (in this case the Company is the Data Processor)
c)			

Source of data

a/ Directly from the data subject: if you contract directly with or are entrusted by the Data Controller

b/ Indirectly from the Data Subject: the Data Subject provides the data to the intermediary (foreign/domestic travel agency, legal entity (hereinafter referred to as "Contracting Partner"), who transfers the data to the Company.

Where the Company obtains the personal data from a Contracting Partner (data processing), the consent to process the data is obtained from the Contracting Partner. The Company is not responsible for the absence of consent.

The Company shall stipulate the following in the contract with the Contracting Partner:

- the contracting partner has obtained the consent and is therefore solely responsible;
- the thorough listing of the Data Subjects' data
- if the Company transfers data to other service providers in the framework of this contract, the authorisation for the transfer of data per group of service providers (accommodation, event venue, catering, travel agents, passenger transport companies, IT and technical companies, etc.)
- the duration of the processing, which will largely last until the invoice for the service is settled after the trip.

Scope of data processed

Full name of the contracting party, telephone number, signature, personal data falling within the scope of account information, personal data of individuals involved in the performance, data relating to meals, travel document data.

Legal basis for processing

Article 6(1)(a) and (b) of the GDPR

1.2 Information to natural persons in contractual relationships whose personal data are directly or indirectly involved in the travel management process and are brought to the attention of the Data Controller

Data subjects	Categories of data processed	Source of data	Legal basis
Contact person of a legal person having a contractual relationship with the Data Controller	name, telephone number, email address	Employer of the data subject	Article 6(1)(f) GDPR
Representative, manager of a legal person, body having legal personality under personal law, having a contract with the controller	name, telephone number, email address	Employer of the data subject	Article 6(1)(b) GDPR
Natural person who has entered into a contract with the controller	name, telephone number, email address	Employer of the data subject or other public source	Article 6(1)(b) and (c) GDPR

Purpose of data processing: necessary for the entry into force of the contract or to make the performance of the contract more efficient.

Source of data

Directly from the Data Subject or directly from the Contracting Partner

Scope of data processed

Name, job title, e-mail address, telephone number, signature of the data subject.

2. DATA TRANSMISSION

No data is transferred to countries outside the EU.

Data may be transferred:

- Data to a court, police, prosecutor's office, bailiff, public administration body necessary to decide on a specific case; and to a public tax authority.
- Data may also be transferred in order to exercise rights and fulfill obligations in connection with a contractual relationship in cases that cannot be specified in advance (e.g. to the tax authorities, for audits relating to the operation of the Company; to a law firm providing legal representation).
- For payment purposes, it is forwarded to the accountant by e-mail. In order to ensure the security of your data, we have established specific guarantees for personal data in the framework of the cooperation with the accounting firm.
- In order to organise an event, data may be transmitted to: accommodation, event venues, catering units, passenger transport companies, IT companies, professional groups. These data will be transmitted by e-mail.

3. DATA PROCESSORS

In addition to the foregoing, the Data Controller will transfer data only to its contractually related co-controllers and/or processors, including only to those who are contractually bound to the Data Subject; accordingly, the Data Controller will transfer data to third parties only for the purposes and to the extent necessary to fulfill the purposes set out in this Policy.

Data processors: accountants, accommodation, event venues, catering establishments, passenger transport companies, IT companies, professional organisations

4. AUTOMATIC DATA MANAGEMENT (including profiling)

No profiling or automated decision making will take place during the processing. In the latter context, the Company informs the Data Subjects that it does not make decisions on the conclusion of contracts based solely on automated processing. The Company does not profile any Data Subject on the basis of the available personal data.

5. **EXERCISE OF RIGHTS, REMEDIES**

The Data Subject may exercise his/her rights under the GDPR and the Info law throughout the entire period of data processing. The rights may be exercised subject to the legal basis.

Details of the individual rights:

Right to information: the Data Subject has the right to be informed of the way in which personal data are processed before the processing starts (Articles 12-14 GDPR).
Right to rectification: the Data Subject has the right to request the rectification of his or her personal data if the personal data held by the controller are inaccurate and he or she can prove this. (Article 16 GDPR).
Right of access: the Data Subject has the right to obtain from the controller the personal data held about him or her (Article 15 GDPR) .
Right to erasure, right to be forgotten: the Data Subject has the right to obtain the erasure of his or her data once and for all, except where the processing is based on the performance of a contract, the fulfilment of a legal obligation or the exercise of official authority (Article 17 GDPR).
Right to object: where the legal basis is based on legitimate interest or on the exercise of official authority, the Data Subject may object to the processing of his or her personal data, but such objection does not imply the immediate erasure of his or her data (Article 21 GDPR).
Right to restriction: if the Data Subject does not consider the Controller to be entitled to process his or her personal data, he or she may request the suspension of the processing of his or her personal data during the investigation (Article 18 GDPR).
Right to data portability: the Data Subject has the right to obtain the personal data held about him or her in digital, tabular form (Article 20 GDPR).
Right to redress: If the Data Subject considers that the Data Controller has infringed the applicable data protection legislation <ul style="list-style-type: none">- he/she may submit a request to the Data Controller's postal address or to the e-mail address andrea.vandor@altagra.hu. The Data Controller will provide written information within the shortest possible time, up to a maximum of 25 days (15 days in the event of a protest).- If the Data Subject disagrees with the decision of the Data Controller, the Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information 1055 Budapest, Falk Miksa utca 9-11., 1363 Budapest, Pf.: 9., ugyfelszolgalat@naih.hu, +36 1 391-1400, www.naih.hu). or-has the right to apply to a court, which will rule on the matter out of turn. In such a case, you are free to decide whether to bring your action before the competent court in the place of your domicile (permanent address) or residence (temporary address) or the court of the place where the Company has its registered office. You can find the court of the place of residence or domicile at http://birosag.hu/ugyfelkapcsolatiportal/birosag-kereso.
Withdrawal of consent: where processing is based on consent, the Data Subject may withdraw his or her consent at any time. Acceptance of a withdrawal request may imply the deletion of the data, but where processing is also carried out for other purposes, processing shall cease only in relation to that purpose.

Right to review of automated decision-making: the Data Subject has the right to request a manual review of any processing operation where the controller has applied automated decision-making with legal effect on the Data Subject.

6. PROTECTION OF DATA

The Company will take all reasonable steps to ensure that the data it processes is not accessible to unauthorised persons. The Data Controller shall take appropriate IT, technical and personnel measures to protect the personal data it processes against, inter alia, unauthorised access or unauthorised alteration.

Budapest, 30 May 2023