



## PRIVACY NOTICE OF THE TOURIST OFFICE OF THE ARCHDIOCESE OF ESZTERGOM-BUDAPEST

Regarding data processing on the [www.visitesztergom-budapest.hu](http://www.visitesztergom-budapest.hu) website

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Last amended on August 9, 2021

### 1. Protection of personal data. Principles

Principles governing the processing of personal data:

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject (**‘lawfulness, fairness and transparency’**);
- collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes (**‘purpose limitation’**);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**‘data minimization’**);
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (**‘accuracy’**);
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which they are processed (**‘limited storage’**);
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (**‘integrity and confidentiality’**).

During the processing, the Controller shall act in compliance with the above principles and take the necessary measures to demonstrate compliance with the principles of data processing (**‘accountability’**).



Legal basis for processing personal data:

Data may be processed only if appropriate legal basis is available. No data may be processed in the absence of an appropriate legal basis.

Such a legal basis can be:

- Where the processing is based on the law, i.e. It is necessary to comply with a legal obligation to which the Controller is subject (e.g., to fulfill an invoicing obligation)
- If the data subject has consented to the processing of his/her personal data for one or more specific purposes (for example, consent to be contacted)
- Where it is based on the legitimate interests of the Controller (for example, processing of personal data for the purpose of handling legal disputes)
- Where processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (for example, performance of a service used via the website)
- Where processing is necessary in order to protect the vital interests of the data subject or of another natural person (for example, measures taken for accident prevention)

## 2. Interpretation of terms

**‘Processor’** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

**‘Processing’** means any operation or set of operations which is performed upon Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**‘Restriction of processing’** means the marking of stored Personal Data with the aim of limiting their processing in the future.

**‘Controller’** means a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data. Where the purposes and means of the Processing are determined by Union or Member State law, Union or Member State law may also determine the Controller or the specific criteria for the designation of the Controller.

**‘Personal data breach’** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.



**‘Pseudonymisation’** means the processing of Personal Data in such a manner that the Personal Data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the Personal Data are not attributed to an identified or identifiable natural person.

**‘Data subject’s consent’** means any freely given, specific, informed and unambiguous indication of his or her wishes by which the Data Subject, either by a statement or by a clear affirmative action, signifies agreement to Personal Data relating to him or her being processed.

**‘Identifiable natural person’** means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person;

**‘Recipient’** means a natural or legal person, public authority, agency or any other body to which Personal Data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the Processing.

**‘Data Subject’:** a natural person identified or identifiable on the basis of any information.

**‘Third Party’** means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct the Controller or Processor, are authorized to process Personal Data.

**‘Law/Legislation/Legal Obligations:’** The Hungarian and European Union legislation in force from time to time.

**‘Sensitive Data’** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data and biometric data for the purpose of uniquely identifying a natural person, data concerning health or Personal Data concerning a natural person’s sex life or sexual orientation.

- (a) **‘Genetic Data’** means all Personal Data relating to the genetic characteristics of an individual that have been inherited or acquired, which give unique information about the physiology or the health of that individual, resulting in particular from an analysis of a biological sample from the individual in question;
- (b) **‘Biometric Data’** means Personal Data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.



(c) 'Data Concerning Health' means Personal Data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

**'Profiling'**: any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

**'Personal Data'** means information relating to an identified or identifiable natural person. Identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 3. Controller

Controller: **Esztergom-Budapest Archdiocese (Tourist Office)**

Registered seat: 1014 Budapest, Úri utca 62.

Postal address: 1250 Budapest, 1. Pf 1.

E-mail: [turizmus@esztergomi-ersekseg.hu](mailto:turizmus@esztergomi-ersekseg.hu)



## 4. Personal data processed

Designation of processing	Purpose of processing	Legal basis of processing	Scope of processed data	Duration of processing
<b>Contacts</b>	The purpose of Processing is to enable the Controller to respond to your question or request and, thus, to fulfill the terms of your request as far as possible.	Consent of the Data Subject, Article 6(1)(a) GDPR	Any Personal Data that you, as the Data Subject, provide to the Controller during the contact, typically name, telephone number, email address.	The Controller will process the Personal Data until the question is answered or the submitted request is settled or your consent is withdrawn. Thereafter, all Personal Data provided by you will be permanently and irretrievably deleted.
<b>Cookie management</b>	The Controller uses cookies on its website, and the service providers used by the Controller may place cookies on the visitor's computer in order to display targeted advertisements to the visitor.	Consent of the Data Subject, Article 6(1)(a) GDPR	Details of the user's computer; IP address used by the visitor, Browser type, Characteristics of the operating system of the device used for browsing.	The Controller will Process the Personal Data until you withdraw your consent (by disabling cookies on your browser) or for a maximum period of 18 months. Thereafter, the Personal Data will be deleted.
<b>Preparing a personalized itinerary</b>	The purpose of Processing is to enable the Controller to create a personalized itinerary for you from the locations you have added to your itinerary.	Consent of the Data Subject, Article 6(1)(a) GDPR	Email address, stations on the compiled route	The Controller processes Personal Data on the basis of consent, as the legal basis, for a period of 1 year from the date of their collection or until the date of withdrawal of consent.



<b>Sending newsletters</b>	The purpose of Processing is to inform you about news, services, events, activities and other relevant content of the Controller.	Consent of the Data Subject, Article 6(1)(a) GDPR	Name, email address	The Controller Processes Personal Data on the basis of consent, as the legal basis, until the purpose of the Processing is fulfilled or the consent is withdrawn (unsubscribe from the newsletter).
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## 5. Recipients of processing. Processors

<b>Identification of recipient</b>	<b>Purpose of Data Transfer</b>
<b>Google Ireland Ltd.</b> (company registration number: 368047)	Cookie management, use of analytics services

The privacy statements of the service providers listed in the table are available via the links below:

- 1) Google Ireland Ltd.

<https://policies.google.com/privacy?hl=en-US>

The Controller is not responsible for the content, data and information protection practices of external websites (Google, Facebook, Tripadvisor, etc.) that can be accessed from the Website as a springboard. The Controller will remove the link from the Website without delay if it becomes aware that the sites linked by it or the link infringe third-party rights or the applicable legislation.

The content of external websites accessible from the Website as a springboard usually originates from third parties who are not affiliated with the Controller. These third parties may also place content, cookies, web beacons on the user's computer or collect data on their own websites using similar technologies. In such cases, Processing is governed by the data protection requirements set by such third parties and the Controller does not accept any liability for any such Processing.



## 6. Data security measures

To ensure an adequate level of data security, the Controller has assessed the risks associated with its Processing activities and evaluated them according to different criteria in terms of severity and likelihood of occurrence.

In relation to its Website, the Controller provides the necessary privileges and internal organization and technical solutions during the operation of the information technology systems in order to prevent unauthorized persons access, erase or modify the data or save them from the system. We enforce the data protection and security requirements against our data processors as well.

We keep a record of any personal data breaches and, if necessary, we inform you of any incidents that occur.

The Internet communication between the User and the Website is provided encrypted end-to-end via the https (http+ssl) protocol.

The Controller applies password protection on its computers and firewalls its IT equipment.

The Controller equips the computers it owns with appropriate passwords and virus protection software, and disposes of its IT equipment in accordance with the relevant scrapping protocol.

In the event of a data transfer, the Controller records the reason and time of the data disclosure in a protocol and keep a record of the transfers as required by the GDPR.

## 7. Data subjects' rights

At any time, you have the right to request **information** about the Personal Data we process about you by post, electronically or by telephone using the contact details provided in this notice.

We will inform you on request on:

- The data processed,
- The purpose of processing,
- The legal basis,
- The duration,
- Who receive or has received your data and for what purposes.

The information will be provided in writing, on paper or electronically depending on the form of the request, within 30 days of the request.



You may **object** to the Processing of your personal data at any time. Your objection will be investigated within the shortest possible time inside a 30-day time limit from the receipt of the request and adopt a decision as to the merits thereof, and notify you of the decision.

At any time, you have the right to request the **deletion of Personal Data** that we process or the **rectification of Personal Data** that have been incorrectly recorded.

In addition, we **block** your Personal Data if you so request or it can be assumed on the basis of available information available to us that deletion would harm your legitimate interests. Personal Data blocked in this way will only be processed as long as the purpose of the Processing excluding the erasure of the Personal Data exists.

The Data Subject may, through the contact details provided in this notice, request that the Controller **restricts the** processing of his/her Personal Data (by clearly indicating the restriction and ensuring that the processing is kept separate from other data) where

- he/she contests the accuracy of the Personal Data (in which case the Controller restricts Processing until it verifies the accuracy of the Personal Data);
- the Processing is unlawful and the Data Subject opposes the erasure of the data and requests the restriction of their use instead;
- the Controller no longer needs the Personal Data for the purposes of the Processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims; or
- the Data Subject has objected to Processing (in this case, the restriction applies to the period pending the verification whether the legitimate grounds of the Controller override those of the Data Subject).

You are entitled to receive, via the contacts specified in this Notice, your Personal Data that you have provided to the Controller in a structured, commonly used and machine-readable format and have the right to **transmit** those data to another controller without hindrance from the Controller.

We will comply with and notify you of the request for access, erasure, rectification, restriction, portability and blocking as soon as reasonably practicable, but no later than within 30 days. If your request cannot be granted, you will still be notified within 30 days.

If we have transferred the data to another person with your consent, we will also notify the recipient of the transfer of the necessary steps.

Where we process your Personal Data based on your consent, you have the right to **withdraw your consent** at any time. You may withdraw your consent by contacting the Controller at the contact details set out in this Notice.





Esztergom-Budapest  
Főegyházmegyei  
Turisztikai Iroda

1014 Budapest, Úri utca 62.  
E-mail: turizmus@esztergomi-  
ersekseg.hu  
Levél cím: 1250 Budapest, 1. Pf 1.  
Tel: 225-2590  
Fax: 202-5458

Esztergom - Budapest Archdiocesan Tourist Office

1014 Budapest, Úri utca 62.  
E-mail: turizmus@esztergomi-ersekseg.hu  
Postal address: 1250 Budapest, 1. Pf 1.  
Tel: 225-2590  
Fax: 202-5458

**If you are visually impaired or elderly, you may request the Controller to provide you with the content of the Privacy Notice in Word (text) or large print format using the contact details set out in this Privacy Notice.**

In addition, you have **the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information** or to **enforce** your rights regarding the processing of Personal Data **before the competent Court** of jurisdiction under Act CXXX of 2016 on the Code of Civil Procedure.

1055 Budapest, Falk Miksa utca 9-11.

[www.naih.hu](http://www.naih.hu),

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

You can find the competent court on the following link:

<https://birosag.hu/birosag-kereso>

You may exercise the rights listed in this Notice at any time by contacting the Controller by email or otherwise in writing. In the context of your request, you may be asked to identify yourself or provide other data relating to yourself that may be used to verify your eligibility.

You can contact the Controller using the contact details set out in Clause 3.

**Esztergom-Budapest Archdiocese  
(Tourist Office)  
Controller**