



ESZTERGOM-BUDAPEST ARCHDIOCESE - TOURISM OFFICE

PRIVACY NOTICE

In connection with your data processing on the www.visitesztergom-budapest.hu website

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Last modified on 27 February 2024.

1. Glossary

Data Processor: a natural or legal person, public authority, agency or any other body that processes Personal Data on behalf of the Controller.

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

Restriction of processing: marking of stored Personal Data for the purpose of restricting their future processing.

Data Controller: 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 Union or Member State law determines the purposes and means of the processing, Union or Member State law may also determine the controller or the specific criteria for the designation of the controller.

Data Breach: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.



Pseudonymization: processing of Personal Data in such a way that it is no longer possible to identify the Personal Data relating to a specific natural person without the use of additional information, provided that such additional information is stored separately and technical and organisational measures are taken to ensure that no identified or identifiable natural person can be linked to that Personal Data.

Consent of the Data Subject: a voluntary, specific, informed and unambiguous expression of the Data Subject's will, by which the Data Subject indicates, by a statement or by an act unambiguously expressing his or her consent, that he or she consents to the processing of Personal Data concerning him or her.

An identifiable natural person is 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, 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: a natural or legal person, public authority, agency or any other body with whom or to which Personal Data is disclosed, whether or not a third party. Public authorities that may have access to Personal Data in the context of an individual investigation in accordance with Union or Member State law are not recipients, and the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing.

Data subject: a natural person identified or identifiable on the basis of any information.

Third Party: any natural or legal person, public authority, agency or any other body other than the Data Subject, the Controller, the Processor or the persons who, under the direct authority of the Controller or the Processor, are authorised to process Personal Data.

Law/legislation/legal obligations: the Hungarian and EU legislation in force at the time.

Special categories of Data: Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership, as well as genetic and biometric data for the purpose of uniquely identifying natural persons, health data and Personal Data concerning the sex life or sexual orientation of natural persons:

- (a) Genetic Data: any Personal Data relating to the inherited or acquired genetic characteristics of a natural person which contains specific information about the physiology or state of health of that person and which results primarily from the analysis of a biological sample taken from that natural person;
- (b) biometric data: any Personal Data relating to the physical, physiological or behavioural characteristics of a natural person obtained by means of specific technical procedures which allow or confirm the unique identification of a natural person, such as facial image or dactyloscopic data;



- (c) health data: personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person which contain information about the health of the natural person.

"Profiling": any form of automated processing of Personal Data whereby Personal Data is used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with the performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements of a natural person.

Personal Data: any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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.

2. The Data Controller

Data Controller: **Esztergom-Budapest Archdiocese (Tourism Office)**

Seat: 1014 Budapest, Úri utca 62.

Postal address: 1250 Budapest, 1. Pf. 1.

E-mail: turizmus@esztergomi-ersekseg.hu

3. The personal data processed

Name of data processing	Purpose of data processing	Legal basis for data processing	Scope of data processed	Duration of processing
Contact	The purpose of data processing is to enable the Data Controller to respond to your question or request, and thus to fulfil the purposes 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 Data Controller during the contact process, typically name, telephone number, email address	The Data Controller will process the personal data until the question is answered or the request is settled or your consent is withdrawn. Thereafter, all personal data provided by you will be permanently and irretrievably deleted



<p>Cookie (cookie) processing</p>	<p>The Data Controller uses cookies on its website, or the service providers used by the Data Controller may place cookies on the visitor's computer for the purposes set out in the Annex. For a detailed description of the list of cookies used on the website and their functions, see the Annex</p>	<p>With regard to the necessary cookies, the Data Controller has a legitimate interest in the proper functioning of its website, Article 6(1)(f) GDPR, With regard to analytical, functional and advertising cookies, the data subject's consent, Article 6 (1) a) GDPR, i.e. these cookies will only be processed by the Data Controller if you have given your explicit consent.</p>	<p>Information about the user's computer; the IP address used by the visitor, the type of browser, the operating system characteristics of the device used for browsing</p>	<p>The Data Controller will process the personal data until the withdrawal of your consent (turning off cookies on your browser) or for a maximum period of 2 years. After that period, the personal data will be deleted</p>
<p>Preparing a personalised itinerary</p>	<p>The purpose of the processing is to enable the Data Controller to create a personalised itinerary for you based on the locations you have added to your itinerary.</p>	<p>Consent of the data subject, Article 6(1)(a) GDPR</p>	<p>Email address, stations on the compiled route</p>	<p>The Data Controller processes personal data on the basis of consent as a legal basis for a period of 1 year from the date of their collection or until the date of withdrawal of consent.</p>
<p>Newsletters</p>	<p>The purpose of the processing is to inform you about news, services, events, activities and other relevant content of the Data Controller.</p>	<p>Consent of the data subject, Article 6(1)(a) GDPR</p>	<p>Name, Email address</p>	<p>The Data Controller processes personal data on the basis of consent as the legal basis for the purpose of processing until the purpose of processing is fulfilled or until the date of withdrawal of consent (unsubscription).</p>



4. Data recipients, data processors

Identification of the recipient	Purpose of data transfer
Google Ireland Ltd.	Use of analytics services (Google Analytics), embedding YouTube videos
Tripadvisor LLC.	Enabling Tripadvisor, facilitating billing with service provider

The privacy notices 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>

- 2) Tripadvisor LLC.

<https://tripadvisor.mediaroom.com/us-privacy-policy>

The Data Controller shall not be liable for the content, data and information protection practices of external websites (Google, Tripadvisor, etc.) that can be accessed from the Website as a springboard. If the Data Controller becomes aware that a page or link it has linked to violates the rights of data subjects or the applicable legislation, it shall immediately remove the link from the Website.

The content of external websites accessible from the Website as a stepping stone usually originates from third parties who are not affiliated with the Data 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, the data processing is governed by the data protection standards set by these third parties and the Data Controller accepts no responsibility for such processing.

5. Data security measures

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



In the operation of the IT systems in the context of the website, the Data Controller shall ensure the necessary access rights management, internal organisation and technical solutions to prevent unauthorised persons from obtaining your data and to prevent unauthorised persons from deleting, removing from the system or modifying the data. We also enforce data protection and data security requirements with our data processors.

We keep records of any data breaches and, where necessary, we will inform you of any data breaches that occur.

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

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

The Data Controller shall equip the computers owned by the Data Controller with appropriate passwords and virus protection software, and shall dispose of its IT equipment in accordance with the relevant disposal protocol.

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

6. Rights of data subjects

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:

- about the data processed,
- the purpose of the processing,
- legal basis,
- duration,
- about who is receiving 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 one month of the request.

You can object to the processing of your personal data at any time. We will examine the objection within the shortest possible time from the date of its submission, but not later than one month, decide whether it is justified and inform you of the decision.



At any time, you have the right to request the **deletion of** personal data we process or the **rectification of** incorrectly recorded personal data.

In addition, **we will block** your personal data if you request it or if we have information available to us that suggests that deletion would harm your legitimate interests. We will continue to process the blocked personal data for as long as the processing purpose or legitimate interest which precluded the deletion of the personal data is maintained.

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

- contests the accuracy of your personal data (in which case the Controller will limit the processing for the period for which it verifies the accuracy of the personal data);
- 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 which case the restriction applies for the period until it is established whether the legitimate grounds of the controller override those of the data subject).

You have the right to obtain, through the contact details provided in this notice, personal data concerning you which you have provided to the Data Controller in a structured, commonly used, machine-readable format, and the right to **transfer** such data to another data controller without the Data Controller's hindrance.

Requests for access, erasure, rectification, restriction, and blocking will be complied with and notified as soon as practicable, but no later than one month. If we have not been able to comply with your request, we will still notify you within one month.

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 on the basis of your consent, you have the right to **withdraw your consent** at any time. You may withdraw your consent by contacting the Data Controller at the contact details set out in this notice.

If you are visually impaired or elderly, you may request the Data 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.



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

You also have **the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11.

www.naih.hu,

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu)

or **to enforce** your rights concerning the processing of personal data **before the Court** having jurisdiction and competence pursuant to Act CXXX of 2016 on the Code of Civil Procedure.

You can find the competent court by following the link below:

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

You may exercise the rights listed in this notice at any time by contacting the Data Controller by e-mail or otherwise in writing. In the context of your request, you may ask the person making the request to identify himself or herself or to provide other personal data relating to him or her which may be used to establish eligibility.

You can contact the Data Controller using the contact details set out in point 2.

Esztergom-Budapest Archdiocese
(Tourism Office)
Data Controller



Annex (cookies used):

Cookies needed

The necessary cookies are crucial to the essential functionality of the website and the website will not function properly without them. These cookies do not store personally identifiable information.

Cookie	Maximum storage time	Target
XSRF-TOKEN	2 hours	It is used for security purposes, e.g. to protect the website against external calls.
_aback	1 year	This cookie is designed to detect and protect when a client tries to replay a cookie. This cookie handles the interaction with online bots and takes the appropriate action.
bm_sz	4 hours	This cookie is set by the Akamai Bot Manager provider. This cookie is used to manage your interaction with online bots. It also helps to prevent fraud.
datadome	session	This is a security cookie set by Force24 to detect BOTS and malicious traffic.
cookieyes-consent	1 year	This cookie is used by CookieYes. It notes the user's preferences for consent so that they can be respected when the user visits the website next. Does not collect or store any personal data about visitors to the website.
visitesztergom_budapesthu_session	2 hours	It records the activities performed in a session for the user's convenience.

Analytical cookies

Analytical cookies are used to understand how visitors interact with the website. These cookies provide information about the number of visitors, bounce rate, traffic source, etc.

Cookie	Maximum storage time	Target
_ga	1 year 1 month 4 days	Google Analytics uses the cookie to calculate visitor, session and campaign data and track site usage for analytics reporting on the site. The cookie stores data anonymously and identifies individual users by associating a randomly generated number.
_gid	1 day	Google Analytics uses the cookie to store information about how visitors use the website, and to generate an analytics report on website performance. The data collected may include anonymously the number of visitors, their source and the pages visited.
_gat_UA-*	1 minute	Google Analytics sets this cookie to track user behaviour.
ga*	1 year 1 month 4 days	Google Analytics sets this cookie to store and count page views.
TADCID	10 years	Tripadvisor sets this cookie to store users' unique identifiers to help them view Tripadvisor embedded content.



TAUnique	2 years	TripAdvisor sets this cookie to track visitors to each website.
TASession	session	TripAdvisor sets this cookie to track visitors to each website.

Functional

Functional cookies help us to perform certain functions, such as sharing website content on social media platforms, collecting feedback and other third-party functions.

Cookie	Maximum storage time	Target
ServerPool	session	This cookie is set by the service provider Tripadvisor. This cookie is used to track the user and to view Tripadvisor's embedded content, such as payment of referral commissions, etc.
TASSK	6 months	This cookie is set by the service provider Tripadvisor. This cookie is used to view Tripadvisor embedded content for the visitor. It also helps to know whether the visitor has clicked on the advertisement to collect payment from Tripadvisor.
TATravelInfo	14 days	This cookie is set by the service provider Tripadvisor. This cookie is used to view Tripadvisor content and advertisements, which in turn helps Tripadvisor earn money when the visitor clicks on ads.

Advertisement

Advertising cookies are used to serve visitors with personalised ads based on the pages they have previously visited and to analyse the effectiveness of the advertising campaign.

Cookie	Maximum storage time	Target
NID	6 months	Google uses this cookie for advertising purposes. It limits the number of times an ad is shown to a user, mutes unwanted ads, and measures the effectiveness of ads.
TACds	2 months	This cookie is set by the service provider Tripadvisor. This cookie is used to display travel information and advertisements based on the user's preferences.
SRT	1 hour	This cookie is set by the service provider Tripadvisor. It is a Tripadvisor session cookie used for advertising purposes.
TART	5 days	This cookie is set by the service provider Tripadvisor. This cookie is used to view Tripadvisor content and advertisements, which in turn helps Tripadvisor earn money when the visitor clicks on ads.



TAUD	14 days	This cookie is set by the service provider Tripadvisor. It is a Tripadvisor session cookie used for advertising purposes.
YSC	session	YouTube uses the cookie to track the views of videos embedded on YouTube pages.
VISITOR_INFO1_LIVE	6 months	YouTube uses the cookie to measure bandwidth and decide whether the user gets the new or the old player interface.
test_cookie	16 min	doubleclick.net uses the cookie to determine whether the user's browser supports cookies.
VISITOR_PRIVACY_METADATA	6 months	YouTube sets this cookie to store the user's cookie contribution status in the current domain.
yt-remote-device-id	never	YouTube uses the cookie to store the user's video preferences for embedded YouTube videos.
yt-remote-connected-devices	Never	YouTube uses the cookie to store the user's video preferences for embedded YouTube videos.
yt.innertube::nextId	Never	YouTube uses this cookie. It registers a unique identifier to store information about what videos the user has watched on YouTube.
yt.innertube::requests	Never	YouTube uses this cookie. It registers a unique identifier to store information about what videos the user has watched on YouTube.
TASameSite	session	The TASameSite cookie is an HTTP cookie that websites use to set the SameSite attribute. This attribute helps protect the site from cross-site request forgery (CSRF) attacks.
__vt	1 hour	It links a user's preferences and website behaviour to the TripAdvisor website, allowing TripAdvisor to display relevant ads to that user.
PMC	2 years	This cookie allows the visitor to view Tripadvisor embedded content, such as advertisements. This cookie is also used by the website to determine whether the visitor clicks on ads to collect payment from Tripadvisor.
TASID	1 hour	To view Tripadvisor embedded content, including paying referral commissions and tracking users through the websites.