

## We respect your privacy

The protection of your privacy throughout the course of processing personal data as well as the security of all business data are important concerns to us. We process personal data that was gathered during your visit of our Online Offers confidentially and only in accordance with statutory regulations.

### Controller

Holisztikus Alapellátás Kft. is the controller responsible for the processing of your data; exceptions are outlined in this data protection notice.

Our contact details are as follows:

Holisztikus Alapellátás Kft.  
székhely: 1103 Budapest, Noszlopy utca 32. 3  
email: [board@eventtesting.eu](mailto:board@eventtesting.eu)

### Area of validity, scope of the Policy

The scope and general provisions of this Policy apply to all processing of personal data by the Data Controller and to all its employees.

The legitimacy of the processing of personal data is to be evaluated on the basis of the REGULATION 2016/679 of the European Union (GDPR) and Act CXII of 2011 on the Right of Informational Self Determination and on Freedom of Information (Privacy Act) as well as on the basis of other legislative provisions (e.g. Act I of 2012 on the Labour Code).

### Principles

Personal data consists of all information related to an identified or identifiable natural person, this includes, e.g. names, addresses, phone numbers, email addresses, contractual master data, contract accounting and payment data, which is an expression of a person's identity.

We collect, process and use personal data (including IP addresses) only when there is either a statutory legal basis to do so or if you have given your consent to the processing or use of personal data concerning this matter, e.g. by means of registration. Our company process personal data in accordance with data protection principles (e.g. purpose limitation, data minimisation) and applicable legislation (e.g. GDPR, Infotv.).

### Processing purposes, processed categories of data, legal basis, retention periods

We as well our service providers process your personal data according the follows:

<b>Processing purpose</b>	Application for service
<b>Legal basis</b>	Entering in a contract GDPR Art. 6. b)
<b>Categories of personal data</b>	Identification data (e.g. name, place and date of birth, mother's name, passport number, Social Security Number), Contact details (e.g. email, phone number)
<b>Retention periods</b>	until the delivery of the test results, but no later than 2 months

<b>Processing purpose</b>	Performing SARS-CoV2/COVID-19 PCR test
<b>Legal basis</b>	Performance of a contract GDPR Art. 6. b), Data subject's consent GDPR Art. 6. a)
<b>Categories of personal data</b>	Identification data (e.g. name, place and date of birth, mother's name, passport number, Social Security Number), Contact details (e.g. email, phone number)
<b>Retention periods</b>	until the delivery of the test results, but no later than 2 months

<b>Processing purpose</b>	Communication with the data subject
<b>Legal basis</b>	Performance of a contract GDPR Art. 6. b)
<b>Categories of personal data</b>	Identification data (e.g. name, place and date of birth, mother's name, passport number, Social Security Number), Contact details (e.g. email, phone number)
<b>Retention periods</b>	until the delivery of the test results, but no later than 2 months

<b>Processing purpose</b>	Invoicing
<b>Legal basis</b>	Legal obligation GDPR Art. 6. c)
<b>Categories of personal data</b>	Identification data (e.g. name, place and date of birth, mother's name, passport number, Social Security Number)
<b>Retention periods</b>	8 years after billing

<b>Processing purpose</b>	Resolving service disruptions/security issues
<b>Legal basis</b>	Legitimate interest GDPR Art. 6. f)
<b>Categories of personal data</b>	Identification data (e.g. name, place and date of birth, mother's name, passport number, Social Security Number), Billing address
<b>Retention periods</b>	30 days

## Source of personal data

In case of private order the personal data comes directly and voluntarily from the data subject. In case of a company order the source of the data is the company as an independent data controller.

## Log files

Each time you use the internet, your browser is transmitting certain information which we store in so-called log files.

We store log files to determine service disruptions and for security reasons (e.g., to investigate attack attempts) for a period of 30 days and delete them afterwards. Log files which need to be maintained for evidence purposes are excluded from deletion until the respective incident is resolved and may, on a case-by-case basis, be passed on to investigating authorities.

In log files, the following information is saved:

- IP address (internet protocol address) of the terminal device used to access the Website;
- Internet address of the website from which the Website is accessed (so-called URL of origin or referrer URL);
- Name of the service provider which was used to access the Website;
- Name of the files or information accessed;
- Date and time as well as duration of recalling the data;
- Amount of data transferred;
- Operating system and information on the internet browser used, including add-ons installed (e.g., Flash Player);
- http status code (e.g., “Request successful” or “File requested not found”).

### **Service providers (general)**

We involve external service providers with tasks such as laboratory services, contract management, payment handling, programming, data hosting. We have chosen those service providers carefully and monitor them on a regular basis, especially regarding their diligent handling of and protection of the data that they store. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions.

The below mentioned service providers act as our data processors:

#### **Hosting:**

DigitalOcean, LLC.

101 Avenue of the Americas, 10th Floor, New York, USA, NY 10013,

contact: [privacy@digitalocean.com](mailto:privacy@digitalocean.com)

Physical location of personal data: Hanauer Landstrasse 302, Frankfurt am Main, Germany, D-60314

#### **Web developing and support:**

Fisherman's Online Kft. (7400 Kaposvár, Jutai út 18.)

### **Payment service providers**

We involve external payment service providers. Depending on the type of payment method you choose during the ordering process, we transfer the data used for the processing of payments (e.g. bank account or credit card data) to the financial institution charged with the payment or to payment service providers commissioned by us. Sometimes, payment service providers also collect and process such data as controllers. In that case (payment service providers are data controllers) the data protection notice or privacy policy of the respective payment service provider applies.

### **Data transfer to other controllers**

Principally, your personal data is forwarded to other controllers only if required for the fulfillment of a contractual obligation, or if we ourselves, or a third party, have a legitimate interest in the data transfer, or if you have given your consent. Particulars on the legal basis and the recipients or categories of recipients can be found in the **Section – Processing purposes, processed categories of data, legal basis, retention**

## **periods.**

Additionally, data may be transferred to other controllers when we are obliged to do so due to statutory regulations or enforceable administrative or judicial orders.

We transfer your data to the following recipients:

### **Payment service provider:**

Simple Pay - OTP MOBIL Szolgáltató Kft.,  
1143 Magyarország, Budapest, Hungária krt. 17.  
Privacy policy: <https://simplepay.hu/adatkezelesi-tajekoztatok/>

### **Laboratory:**

Országos Foglalkozás-Egészségügyi Szolgálat Kft.,  
2724 Újlengyel, Határ út 12.  
Privacy policy: <https://hivataloscovidteszt.hu/wp-content/uploads/2017/12/Hivataloscovidteszt-%C3%81tal%C3%A1nos-adatkezel%C3%A9si-szab%C3%A1lyzata-2021-EN.pdf>

## **Transfer to recipients outside the EEA**

We might transfer personal data to recipients located outside the EEA into so-called third countries.

In such cases, prior to the transfer we ensure that either the data recipient provides an appropriate level of data protection or that you have consented to the transfer.

## **External links**

Our Website may contain links to internet pages of third parties, in particular providers who are not related to us. Upon clicking on the link, we have no influence on the collecting, processing and use of personal data possibly transmitted by clicking on the link to the third party (such as the IP address or the URL of the site on which the link is located) as the conduct of third parties is naturally beyond our control. We do not assume responsibility for the processing of personal data by third parties

## **Security**

Our employees and the companies providing services on our behalf, are obliged to confidentiality and to compliance with the applicable data protection laws.

We take all necessary technical and organizational measures to ensure an appropriate level of security and to protect your data that are administrated by us especially from the risks of unintended or unlawful destruction, manipulation, loss, change or unauthorized disclosure or unauthorized access. Our security measures are, pursuant to technological progress, constantly being improved.

## **Cookies**

The website does not use cookies.

## **Data subject rights**

To enforce your rights, please use the details provided in the [Data controller](#) section. In doing so, please ensure that an unambiguous identification of your person is possible.

**Right to information and access:** You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

**Right to correction and deletion:** You have the right to obtain the rectification of inaccurate personal data concerning yourself without undue delay from us. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

**Restriction of processing:** You have the right to demand for – as far as statutory requirements are fulfilled – restriction of the processing of your data.

**Objection to data processing based on the legal basis of “legitimate interest”:** In addition, you have the right to object to the processing of your personal data at any time, insofar as this is based on “legitimate interest”. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

**Withdrawal of consent:** In case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

**Data portability:** If the data processing is based on your Consent or the performance of a contract, you are entitled to receive data that you have provided to us in a structured, commonly used and machine-readable format or – if technically feasible – to demand that we transfer those data to a third party.

**Right of complaint with supervisory authority:** You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority which is responsible for your place of residence or your state of residency or to the supervisory authority responsible for us. This is:

National Authority for Data Protection and Freedom of Information  
H-1125 Budapest  
Falk Miksa utca 9-11.  
Hungary

Telefon: + 36 1 391 1400  
Telefax: + 36 1 391 1410  
E-Mail: [privacy@naih.hu](mailto:privacy@naih.hu)  
Homepage: <http://www.naih.hu>

## Contact

If you wish to contact us, or enforce your rights please find us at the address stated in the "Controller" section.

Date 15.10.2021.