

HELLO WOOD PRIVACY POLICY

THE PERSONA AND CONTACT INFORMATION OF THE DATA MANAGER:

Hello Wood Zrt.

seat: Hungary-1082 Budapest, Kisfaludy u. 19. 3/9.;

registration number: HU28749990;

contact person regarding data protection issues: Máté Balogh head of financial;

email address and telephone number of the contact person: adatkezeles@hellowood.eu, +36 70 314 5345;

hereinafter: Hello Wood

acts as data manager regarding the data of current, previous and future clients.

REGULATIONS ACTING AS BASIS OF DATA MANAGEMENT:

- 1 2011./CXII. Regulation on information self-determination and freedom of information
- 2 2016/679/EU Regulation on personal data protection of natural persons and flow of such information and repealing of regulation 95/46/EK (general data protection regulation)

DEFINITIONS:

client:

Those who have shown interest in the products and services of Hello Wood personally, online, on the telephone or in any other way, as well those in contract with Hello Wood.

data manager:

The natural or legal person, public authority, agency or any other organisation which defines the aims and tools of the management of personal data independently or with others; the aims and tools of data management are defined by European Union or member governmental law, the person of the data manager and the special criteria regarding the assignment of the data manager can be defined by both union and member governmental law;

data management:

The sum of automated or non-automated operations regarding personal data or data bases, such as collection, recording, systemization, division, storing, conversion or modification, query, introspection, utilization, publication, transmission, dissemination or providing access by any other methods, synchronization or attachment, regulation, deletion and annulment;

data processor:

The natural or legal person, public authority, agency or any other organisation which manages personal data on behalf of the data manager;

special categories of personal data:

racial or ethnic ancestry, personal data reflecting on political, religious or ideological belief or trade-union membership, also genetic and biometric data intended for the unique identification of natural persons, healthcare data and personal data regarding the sexual orientation and life of the natural persons.

GDPR:

the 2016/679 REGULATION (27 April 2016) of the EUROPEAN PARLIAMENT AND COUNCIL regarding personal data protection of natural persons and flow of such information and repeal of policy 95/46/EK;

supervisory authority or NAIH:

Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority of Data Protection and Freedom of Information);

PRINCIPLES OF DATA MANAGEMENT:

Hello Wood makes adequate provisions to provide the following regarding the personal data of clients at all times:

- (a) data management on a legitimate, fair and adequate legal basis (legality, fair procedure and transparency);
- (b) data collection for a definite, unequivocal and legitimate purpose;
- (c) adequate, relevant and strictly as-needed data management for the intended purpose of the data collection (data efficiency);
- (d) to be accurate and, if requested, to be up-to-date; the deletion or correction of the inaccurate personal data if possible (accuracy);
- (e) Hello Wood stores data in a form that allows the identification of clients only for a time that is necessary for the purpose of the personal data management;
- (f) Hello Wood manages data in a form that provides protection for personal data by adequate technical and management measures including protection against illegal or unauthorized usage of data and its unintended loss, deletion or damage (integrity and confidentiality).

THE PURPOSE, LEGAL BASIS AND DURATION OF DATA MANAGEMENT:

I. Inquiry about services online, in person, on phone or by other means

Indispensable data for the identification of the client: name

Indispensable data for further correspondence with the client: email address, telephone number

Data required for the clarification of the inquiry by the client and its proper, personalized answering, provided by the client: subject of inquiry

The legal basis of the data management is the consent of the client. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

II. Newsletter subscription

Indispensable data for the identification of the client: name

Indispensable data for further contact with the client: email address, telephone number

Data required for the clarification of the newsletter/eDM, provided by the client: subject of inquiry (if applicable)

The legal basis of the data management is the consent of the client. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

III. Individual inquiry

Indispensable data for the identification of the client: name

Indispensable data for further connection with the client: email address, telephone number)

Data required for the clarification of the inquiry by the client and its proper, personalized answering, provided by the client: subject of inquiry

The legal basis of the data management is the consent of the client. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

IV. Contracting and communication

Indispensable data for the identification of the client: name

Indispensable data for further contact with the client: email address, telephone number

Data required for the definition of the subject of the contract: subject of contract

The legal basis of the data management is the compliance of the contract and the arrangement of the concerned legal disputes and to ensure contractual cooperation and communication.

Duration of the data management is the term of the contract plus five years (term of general civil rights claim validation).

V. Registration for workshops and camp activities

Indispensable data for the identification of the client: name

Indispensable data for further contact with the client: email address, telephone number

Data required for camp activities to providing medical insurance and other related services: medical card number, other information on personal health conditions (e.g. food allergies)

The legal basis of the data management is the compliance of the contract and the arrangement of the concerned legal disputes. Duration of the data management is the term of the contract plus five years (term of general civil rights claim validation).

In the case of a customer under the age of 16, the personal data of his / her parents or legal representatives are handled in order to obtain and record their formally and substantively appropriate data management consent.

VI. Profiling

Data required for the identification of the client and sending personalized offers with the prior consent of the client: Sum of the data collected regarding the activities in I – IV.

The legal basis of the data management is the express consent of the client to profiling. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

ADDRESSEE OF PERSONAL DATA AND CATEGORIES OF ADDRESSEES:

Hello Wood in general shares personal data of clients with the following third parties on a data manager to manager basis:

- (a) organizations providing services to Hello Wood or the clients (e.g. insurance company, IT provider, company providing marketing campaign, accountant);
- (b) third parties involved in the delivery of contract obligations
- (c) supervisory and other regulatory authorities and organizations.

Clients can request from Hello Wood and Hello Wood is required to provide personalized information regarding the management of their data (purpose and legal basis of data management, the scope of data, the transmission of data, the duration of management, and the logic of profiling). It can be requested through the following contact points:

adatkezeles@hellowood.eu
06 20 416 0435
1033 Budapest, Fő tér 1.

THE CLIENT'S RIGHTS TO ACCESSIBILITY:

The client has access to his/her personal data.

If the client requests Hello Wood to provide information about data management Hello Wood is obliged to provide information.

The client's right to information about the data management of Hello Wood

- (a) concerns his/her personal data;
- (b) does not concern anonymous data;
- (c) does not concern personal data of other clients and
- (d) concerns the aliased data clearly connected to the client.

Hello Wood by the request of the client provides accessibility to and a copy of the personal data. If the client requests further copies of the personal data, Hello Wood may charge a reasonable fee for covering administrative costs related to the request, which costs are to be paid by the client.

THE CLIENT'S RIGHT TO CORRECTION

The client has the right to request correction of his/her personal data. This right

- (a) does not concern anonymous data;
- (b) concerns his/her personal data;
- (c) does not concern personal data of other clients and
- (d) concerns the aliased data clearly connected to the client.

Hello Wood corrects and complements personal data by request of the client. Hello Wood informs the addressees of the personal data (if there are any) about the correction. But Hello Wood does not inform the recipients about the correction of personal data if the information of the addressees seems impossible or requires a disproportionate amount of effort.

CLIENTS' RIGHT TO DELETION

Under certain conditions client is entitled to request the deletion of his/her personal data.

Hello Wood is obliged to delete the client's personal data without unwarranted delay if

- (a) Hello Wood manages the personal data and
- (b) client requests the deletion of the personal data and
- (c) the data is not necessary for the purposes for which Hello Wood manages data.

Hello Wood is obliged to delete the client's personal data without unwarranted delay if

- (d) Hello Wood manages the personal data and
- (e) client requests the deletion of the personal data and
- (f) the client withdraws the consent on which management is based and
- (g) there is no further legal basis for the management of the client's personal data.

Hello Wood is obliged to delete the client's personal data without unwarranted delay if

- (h) data management is required for the validation of the rightful interests of Hello Wood or a third party and
- (i) client objects to the data management of Hello Wood and
- (j) no lawful reason for the management of such data has precedence against the objection of the client.

Hello Wood is obliged to delete the client's personal data without unwarranted delay if

- (k) client requests the deletion of the personal data and
- (l) the management of such data by Hello Wood is not illegal and
- (m) deletion of the data is obligatory according to laws in force and
- (n) data of the client is collected regarding the services of the information society.

Hello Wood informs the addressees of the personal data (if there are any) about the correction. But Hello Wood does not inform the addressees about the correction of personal data if the information of the addressees seems impossible or requires a disproportionate amount of effort.

The customer has the right to request the deletion of his/her data only for: certain data or data management purposes.

CLIENTS' RIGHT TO THE RESTRICTION OF DATA MANAGEMENT:

The client may request the restriction of the management of his/her personal data.

The client's right to the restriction of data management

- (a) does not concern anonymous data;
- (b) concerns his/her personal data;
- (c) does not concern personal data of other clients and
- (d) concerns the aliased data clearly connected to the client.

Hello Wood restricts the management of the client's personal data for the duration of the verification of such data if the client requests the restriction of data management and disputes the accuracy of such data.

Hello Wood restricts the management of the client's personal data if the client requests the restriction of data whose management is illegal and the client is against the deletion of such data.

Hello Wood restricts the management of the client's personal data if

- (a) the client requests restriction of the management of his/her personal data and
- (b) Hello Wood has no use for these data for the purpose of data management and
- (c) client requires his/her data for the submission, validation or protection of a legal claim.

Hello Wood restricts the management of the client's personal data if

- (a) the client objects to the management of such data that are necessary for the purpose of Hello Wood's interests and
- (b) the client awaits confirmation that the management of the personal data by Hello Wood has a justified cause which does not have precedence against the objection of the client.

Hello Wood informs the addressees of the personal data (if there are any) about the restriction. But Hello Wood does not inform the addressees about the restriction of personal data management if the information of the addressees seems impossible or requires disproportionately too much effort.

If Hello Wood restricts the management of the client's personal data, Hello Wood can

- (a) store the personal data;
- (b) manage the data by the consent of the client;
- (c) manage the personal data for the submission, validation or protection of a legal claim, or for the protection of a person's rights.

Hello Wood is not permitted to use client data for direct business acquisition, including profiling and automated decision making in individual causes.

THE CLIENT'S RIGHT TO DATA PORTABILITY:

Client is entitled to receive the his/her personal data provided to a data manager in a divided, widely used, computer compatible format. Client is further entitled to transmit the personal data to another data manager without any restriction regarding the receiving data manager if the data management is based on consent or it is necessary for the fulfillment of a contract and the data management is arranged in an automated manner.

The client's right to data portability

- (a) does not concern anonymous data;
- (b) concerns his/her personal data;
- (c) does not concern personal data of other clients and
- (d) does not concern the aliased data clearly connected to the client.

COOKIE POLICY

The hellowood.eu portal contains references arriving from an external server unrelated to Hello Wood and references referring an external server unrelated to Hello Wood. The server of the external provider is in direct connection with the computer of the user. We inform our visitors that the providers of these references may collect user data (IP address, data of the operating system, movement of cursor, and address of the visited page and the time of visit) due to direct connection to their servers and communication with the user's browser.

IP address is a digit sequence with which the computers of the users connecting to the internet can be clearly identified. With the help of the IP address the users of the computers can be located geographically. The address of the visited sites and time data are not sufficient on their own for identifying users. But in combination with other data (e.g. provided during registration) conclusions related to the users may be made.

The external providers reachable on the following links may place small data packages (cookies) on the users' computer, collect their IP address and other data, and display them marketing content:

Purpose:	Name:	Link to the data management policy:
analytic metering	Google Analytics	http://www.google.com/intl/hu/policies/
social video-sharing page	Vimeo	https://vimeo.com/privacy

Data managers provide further information about their data management policies at the links above.

Users can delete cookies from their computers and can block the usage of cookies in their browsers. The management of cookies usually can be done in the Tools/Settings menu of browsers, under the Data protection/Browser history/Personal settings menu under the section cookies or tracking.

DEADLINE FOR SUBMITTING THE CUSTOMER'S REQUEST:

Hello Wood answers the client's requests regarding the permissions above with the following deadlines:

Request	Deadline
Right to information	when the data is collected (if the client shares data) or within one month (if the client does not share data)
Right to accessibility	one month
Right to correction	one month
Right to deletion	without unwarranted delay
Right to restriction of data management	without unwarranted delay
Right to data portability	one month
Right to objection	at the receipt of objection

RIGHT TO SUBMISSION OF COMPLAINTS:

If the client claims that his/her rights were violated, Hello Wood recommends initiating a discussion with the data manager by contacting the contact person indicated above. If such discussion does not lead to conclusion or the concerned person does not wish to take part in such activity, he/she can turn to court or the NAIH (Hungarian National Authority for Data Protection and Freedom of Information). When initiating a judicial proceeding, the person concerned may bring it to the competent court for his/her residency or home address.

Contact information of NAIH:

Szilágyi Erzsébet fasor 22/C., Budapest 1125
Telephone: +36 1 391 1400
fax: +36 1 391 1410
email: ugyfelszolgalat@naih.hu
website: www.naih.hu

Regarding the provided and lawfully managed data, and the restriction and prohibition of the usage and management of the data, Hello Wood undertakes no liability for compensation.

MODIFICATION:

Hello Wood reserves the right to modify the information in this Data Protection Policy at anytime. In case of such modification, Hello Wood will inform clients by email regarding the relevant changes.