Hellohungary Tourism Portal Privacy Policy

The purpose of this Privacy Policy is to present how and what personal data we process in connection with the use of the Website available at https://hellohungary.hu/ ("Website").

Data Controller

The data controller is the Hellohungary Kft; (registered office: H-1011 Budapest, Szilágyi Dezső tér 1., e-mail address: <u>adatvedelem@hellohungary.hu</u>; "**Hellohungary**" or "**we**"). Facebook page: <u>https://www.facebook.com/hellohungaryhh</u> Instagram page: <u>https://www.instagram.com/hellohungaryhh/</u>

Purposes of processing personal data

In connection with the maintenance and provision of the Website as an information society service, we may process your personal data for the following purposes:

- Login, user account management: the processing of your data is justified for us to be able to identify you as a user and provide access to the Website's services. The legal basis for the processing of your data is the implementation of the Website's terms of use as a contractual legal basis.
- Website operation: in the course of operating the Website, we place and process data on your end-user device for the purpose of providing the service in accordance with the Website Cookie Policy, in order to improve the quality of the services of the website operated by the data controller, to facilitate the use of the site (enabling the user to communicate and interact with the website more easily) and to properly manage security and privacy risks, we use so-called "cookies".
- **Providing customer service (contact)**: the processing of your data is justified for us so that we can handle your request or complaint indicated in your inquiry, in connection with which we rely on our legitimate interest as the legal basis.
- Sending newsletters: we inform those who subscribe to the newsletter about our current offers and fresh content, and through this we keep in touch with those interested in our activities, in which case we indicate the voluntary consent of the data subject as the legal basis for data processing.
- **Profiling**: we provide those who have already subscribed to the newsletter with the opportunity to fill out a questionnaire to indicate their preferences regarding the tourism topics that interest them most, and as a result, we categorize them in order to receive a newsletter tailored to their personality and interests. The legal basis for this data processing is the voluntary consent of the data subject.
- **Operating social media platforms**: we publish our latest content and current offers (e.g. prize draws) on these platforms as well, which anyone can comment on. The legal basis for the personal data related to this is the consent of the data subject.

Providing data is voluntary, however, in some cases we will not be able to answer your questions or provide you with the Website services without it.

Type of personal data processed

In order to achieve the purposes set out above, we process the following categories of personal data:

- **Login and user account data**: identification data (name, e-mail address and password), Facebook/Google authentication token, login confirmation code.
- End-user data: the data controller intends to use cookies for administrative purposes; for example, to measure the number of visitors to the website and to facilitate browsing; by remembering previously opened pages within the website. No cookie contains any personal data that would enable anyone to reach you by e-mail, telephone or traditional mail. Cookies cannot identify the user by themselves, they are only suitable for recognizing the visitor's computer. If you do not wish to accept the use of cookies on the website, you can set your web browser to notify you of the placement of cookies or to prevent the placement of cookies. The cookies used by the data controller are collected in Annex 1 to this policy.
- **Customer service data**: name, e-mail address, data of request, application or complaint.
- **Newsletter data:** name, e-mail address and travel destination in case of voluntary response.
- **Profiling data**: name, e-mail address, answers given regarding travel habits (in a multiple-choice system, however, in the "other" category any other answer that is not known in advance can be given).
- **Social media platform data**: name, profile photo, place and date of birth, place of residence, telephone number, e-mail address, which become known to the data controller due to registration on the platforms.

Legal bases for processing your personal data

We rely on various legal bases in order to process your personal data:

- If you give your consent, we will process your personal data based on point a) of paragraph (1) of Article 6 of the GDPR ("**Consent**").
- Performance of a contract between you and us pursuant to point b) of paragraph (1) of Article 6 of the GDPR ("**Performance of a Contract**").
- Compliance with legal obligations pursuant to point c) of paragraph (1) of Article 6 of the GDPR ("Legal Obligation").
- For our or another third party's legitimate interests pursuant to point (f) of paragraph (1) of Article 6 of the GDPR ("Legitimate Interest").

For the following purposes, we process the following categories of personal data on the following legal bases:

Purpose of data processing	Categories of personal data processed	Legal basis
----------------------------	---------------------------------------	-------------

Purpose of data processing	Categories of personal data processed	Legal basis
Login, user account management	Login and user account data, partner profile data / company data	Performance of contract, legitimate interest
Website operation	End-user data	Legitimate interest, consent
Providing customer service	Customer service data	Legitimate interest
Sending newsletters	name, e-mail address and travel destination in case of voluntary response	Consent
Profiling	name, e-mail address, answers given regarding travel habits (in a multiple-choice system, however, in the "other" category any other answer that is not known in advance can be given).	Consent
Operating social media platforms	name, profile photo, place and date of birth, place of residence, telephone number, e-mail address, which become known to the data controller due to registration on the platforms.	Consent