

**INFORMATION AND RULES ON THE DATA PROCESSING OF IWELCOME2 TOURINFORM  
KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG**

iWelcome2 Tourinform Korlátolt Felelősségű Társaság (seat: 2040 Budaörs, Budakeszi utca 29., Magyarország; "**Company**") is hereby giving you the following information concerning the processing of your personal data as is required under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), and in particular in line with Article 13 of the GDPR.

**1. The purpose and legal basis for data processing, the personal data processed, the duration of data processing, persons having access to data, data transfers:**

**1.1 Newsletter**

If you give your consent, the Company processes the following personal data of yours related to the sending of newsletters based on your consent provided according to your own discretion:

name, e-mail address

In such case, the legal basis of the data processing is your consent pursuant to Article 6 (1) a) of the GDPR. Your consent provided according to this section can be withdrawn at any time free of charge via the e-mail address [info@iwelcome2.com](mailto:info@iwelcome2.com). The withdrawal of the consent does not concern the lawfulness of the data processing prior to the withdrawal.

We process your personal data defined in this Section until the withdrawal of your consent.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, the appointed sales colleagues, and Planet of the apps.

**1.2 Data processing related to direct marketing**

If you give your consent, the Company processes the following personal data of yours related to push notifications or e-mail direct marketing:

name, e-mail address, operating system, browser, network operator, used language, and if you provided such information: how many days you spend in Budapest.

In such case, the legal basis of the data processing is your consent pursuant to Article 6 (1) a) of the GDPR. Your consent provided according to this section can be withdrawn at any time free of charge via the e-mail address [info@iwelcome2.com](mailto:info@iwelcome2.com). The withdrawal of the consent does not concern the lawfulness of the data processing prior to the withdrawal.

We process your personal data defined in this section until the withdrawal of your consent.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, the appointed sales colleagues, and Planet of the apps.

### **1.3 Organizing prize contests**

If you participate in a promotion or prize contest organized by the Company from time to time, the Company processes the following data of yours in this respect:

name, e-mail address, address and the personal data shared via the used social media account.

In such case, the grounds for the data processing are Article 6 (1) b) of the GDPR (performance of a contract) and Article 6 (1) c) of the GDPR (compliance with a legal obligation), considering that a contract has been concluded between you and the Company, and in connection with the performance of the contract, the Company is subject to tax and accounting obligations. You are not obliged to provide the above data; however, you cannot participate in the prize contest without providing these data considering that you can sign up for the contest with the content published on your social media account, and in case of winning, we would not be able to contact you.

We process your personal data until the prize contest is completed. If you win a prize during the prize contest, the data necessary for the performance of the Company's tax obligations are processed until the end of the tax law limitation period (for 5 years from the last day of the calendar year in which the tax should have been declared or notification should have been made, or, in case of lack of tax declaration or notification, the tax should have been paid), that means maximum 7 years, and the data necessary for performing our accounting obligations are processed for 8 years.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, the appointed sales colleagues, and Planet of the apps.

### **1.4 Processing of user data**

If you register or purchase in the iWelcome2 application of the Company, the Company processes the following data of yours in this respect:

name, e-mail address, and if you purchase via the application, then the billing address, the date of the purchase, the type and number of the tickets, the amount of the purchase, the GPS coordinates.

The grounds for the data processing are Article 6 (1) b) of the GDPR (performance of a contract) and Article 6 (1) c) of the GDPR (compliance with a legal obligation), considering that a contract has been concluded between you and the Company, and in connection with the performance of the contract the Company is subject to tax and accounting obligations. You are not obliged to provide the above data; however, if you do not provide your name and e-mail address, you cannot get access to your account, and if you do not provide the data necessary for the purchase, we will not be able to perform your purchase.

We process the data defined in this Section as long as the user is registered. Following this, we store exclusively those data and exclusively for the time period that is justified by the purpose of satisfying our legal obligation. Under the tax legislation, the tax law limitation period is 5 year, according to the act on accounting, it is 8 years, and the general civil law limitation period is 5 years.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, Planet of the apps, and in the case of purchase, szamlazz.hu.

### **1.5 The processing of the personal data of the Hop-On Hop-Off street sale purchasers**

If you purchase an e-ticket via the Hop-On Hop-Off street sale service, the Company processes the following personal data of yours in this respect:

e-mail address, and in the case of requesting invoice, name and address

In such case, the grounds for data processing are Article 6 (1) b) of the GDPR (performance of a contract), Article 6 (1) c) of the GDPR (compliance with a legal obligation), considering that a contract has been concluded between you and the Company, and in connection with the performance of the contract, the Company is subject to tax and accounting obligations. You are not obliged to provide the above data; however, if you do not provide your e-mail address, we will not be able to send you're the QR code confirming the purchase.

We store exclusively those data and exclusively for the time period that is justified by the purpose of satisfying our legal obligation. Under the tax legislation, the tax law limitation period is 5 year, according to the act on accounting, it is 8 years, and the general civil law limitation period is 5 years.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, Planet of the apps, and in case of purchase, szamlazz.hu, and Hop-On Hop-Off as independent data controller.

### **1.6 Data processing related to user complaint management**

If you address a complaint to us, we process the following personal data of yours related to this:

name, email address, phone number, the data communicated by the user.

In such case, the grounds for the data processing are Article 6 (1) c) of the GDPR (compliance with a legal obligation), and Section 17/A of the Act CLV of 1997 on Consumer Protection.

We store the minutes of the complaint and the copy of the response for five years.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, and the Customer Service Agent colleague of the Company.

### **1.7 Processing of the personal data of the contractual contact persons**

If you conclude a contract with our Company, the Company processes the following data in this respect:

contact data (name, phone number, e-mail address)  
in case of self-employed person: name, address, tax number, bank account number, further  
contact details (phone number, email address)

In such case, the ground for the data processing is Article 6 (1) b) of the GDPR, the performance of the contract concluded by you with the Company.

If your employer concludes a contract with our Company, the Company processes the following data in this respect:

contact data (name, phone number, e-mail address)  
in the case of self-employed person: name, address, tax number, bank account number, further  
contact details (phone number, email address)

In such case, the ground for the data processing is the legitimate interest of the Company based on Article 6 (1) f) of the GDPR.

We process the data defined in the present Point for 5 or 8 years pursuant to the applicable tax and accounting legislation.

We process the personal data of the contact person and the person involved in the performance of the contract on behalf of the other party until the contact person is replaced, but until the performance of the contract the latest.

Your personal data defined in this Section may be accessed exclusively by the Managing Director of the Company, the Business Development Manager of the Company, Planet of the apps, and szamlazz.hu.

## **2. The data controller:**

The Company acts as controller of your personal data as listed above.

## **3. Storing of data and description of technical and organizational measures applied in order to maintain data safety**

Your personal data are stored at the Company's seat (2040 Budaörs, Budakeszi utca 29., Hungary), and we store it on Google Drive or on Amazon Cloud.

The Company applies all technical safety measures that can be reasonably expected to store the data in a safe way, not accessible to third parties.

An IT description of the safety measures, the technical and organizational measures taken to ensure the safety of data follows below: all the laptops are protected with individual user name and password.

## **4. Your rights in connection with data processing:**

In connection with data processing, you have the following rights:

a) **right of access (Article 15 GDPR):** You are entitled to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information contained herein.

Per your request, the Company provides a copy of the personal data undergoing processing. For any further copies you request, the Company may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless you request otherwise, the information will be provided in a commonly used electronic form.

b) **right to rectification (Article 16 GDPR):** You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. 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.

c) **right to erasure (Article 17 GDPR):** You have the right to obtain from the Company the erasure of personal data concerning you without undue delay and the Company shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the legal basis for data processing is your consent and you withdraw your consent and there are no other legal basis for the data processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject.

The provisions of the present Point c) are not applicable if (i) the data processing is necessary for the purpose of satisfying obligations under EU law or national law applicable for the Company, prescribing the processing of the personal data, or if (ii) the data processing is necessary for submitting, enforcing or protecting legal claims.

d) **right to restriction of processing (Article 18 GDPR):** You have the right to obtain from the Company restriction of processing where one of the following applies:

- you contest the accuracy of the personal data, for a period enabling the Company to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims or
- you have objected to processing; in such a case the restriction is applicable until it is not established that your legitimate interests are overridden by the legitimate interests of the Company.

e) **right to object (Article 21 GDPR):** You are entitled to object against the processing of your personal data at any time for reason related to your own position. In this case, the Company should not process further the personal data, except if the Company proves that the data processing is justified by legally binding legitimate interests, which overrides your interests, rights and freedoms, or which are necessary for submitting, enforcing or protecting

legal claims. In the case if the data processing is carried out for the purpose of satisfying legal obligation, the exercising of the right to object does not have the legal consequence of terminating such data processing under the present Information.

**f) right to receive information on the above rights (Article 12 GDPR):** the Company provides you with information on action taken on your request as per clauses a)-e) above without undue delay and in any event within one month of receipt of your request. The information is provided in a concise, transparent, intelligible and easily accessible form. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company informs you of any such extension within one month of receipt of the request, together with the reasons for the delay.

The information is given free of charge. Where your request is manifestly unfounded or excessive, in particular because of its repetitive character, the Company may either i) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or ii) refuse to act on the request. The Company bears the burden of demonstrating the manifestly unfounded or excessive character of the request.

The Company informs all the addressees to whom or which the personal data was communicated, about Points b)-d) above (i.e. about all the rectification, deletion of data or restriction of data processing), except if it proves to be impossible or requires disproportionate efforts. The Company informs you upon request about such addressees.

**g) right to lodge a complaint (Article 77 GDPR):** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the GDPR. The complaint can be filed with the National Data Protection and Freedom of Information Authority (NAIH) (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.; telephone: +36 1 391 1400; fax: +36 1 391 1410; [www.naih.hu](http://www.naih.hu); [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

**h) right to judicial remedy (Article 79 GDPR):** You have the right to judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company can be brought before the courts of the Member State where the Company has an establishment. Such proceedings may be brought before the courts of the Member State where you have your habitual residence.

**i) right to data portability (Article 20 GDPR):** you have the right to data portability if the ground for the data processing is Article 6 (1) a) or b) of the GDPR, i.e. your consent or the performance of the contract concluded with you. In this case you have the right to receive the personal data of yours that you have provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company. Furthermore, you have the right to have the personal data transmitted directly from the Company to another data controller, where technically feasible.

j) **right to withdraw consent:** you may withdraw your consent provided in respect of the above Points 1.1 and 1.2 at any time, in which case we do not further process your personal data.

**5. You may request information on the processing of your personal data via the channels and from the person below:**

You may request further information in connection with the processing of your personal data via mail (2040 Budaörs, Budakeszi utca 29., Magyarország) or email (info@iwelcome2.com). Per your request, verbal information may also be given in which case, minutes have to be taken. If you request verbal information (e.g. via phone), you are required to prove your identity towards the Company. If you wish to exercise your rights above, you have to contact Mr. Áberl Kocsó, Managing Director.

**6. The data and role of the data processors included in the present Information:**

- Planet of the apps: Planet of the apps Kft., 1094 Budapest, Miháلكovics utca 10., Csibi Ferenc, Managing Director as a data processor providing IT background service to the Company ("Planet of the apps");
- szamlazz.hu: KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság, 1031 Budapest, Záhony utca 7., Stygár-Joó János Managing Director, as data processor providing billing service to the Company ("szamlazz.hu");
- Hop-On Hop-Off: City Tour Hop-On Hop-Off Kft, 1061 Bp. Andrásy út 2., Opra Nikoletta Managing Director, as independent data controller.

Dated: 05. 12. 2018