

DATA PROCESSING NOTICE

Newsletter Subscription to newsletter

Effective date: 15/10/2025

In accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and Regulation (**Info Act**) (EU) 2016/679 of the European Parliament and of the Council 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 - General Data Protection Regulation**), we hereby inform you about the processing of the personal data you have provided:

1. Controller

Name of the Controller		Victofon Hallásjavító Kft.
Address of the Controller		1068 Budapest, Szondi u. 98/a. fszt. 2.
Contact details of the Controller	email	ugyfelszolgalat@victofon.hu
	telephone	+ 06 30 311 4123
	website	https://victofon.hu/hu
Name of data protection officer (if any)		-
Contact details of the Data Protection Officer		-

2. The data processed

Scope of the data processed, purpose and legal basis for processing

Personal data	Purpose of data processing	Legal ground of processing	Data processing (storage) duration
Surname - optional First name Email address	Sending a newsletter to subscribers	Consent of the data subject - Article 6(1)(a) GDPR	Until consent is withdrawn (unsubscribed), but for a maximum of 7 years, unless there is another legal basis supporting the data processing. You can withdraw your consent by clicking Unsubscribe, or by contacting us via the other known contact details. If you refuse to consent, you will not receive a newsletter and will not have any other disadvantages. The data storage period can be extended by renewing the data subject's consent.

Related legislation

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Does the processing involve profiling?

Answer	Short, clear description of profiling
No	---

Does the processing involve automated decision-making?

Answer	Short, clear description of the automatism
No	---

If so, the Data Subject has the right to request manual, human intervention.

The source of the personal data processed:

The data subject

The data will be transmitted:

Category	Company name, registered seat, activity
Processors (performing technical tasks related to data processing operations)	MiniCRM Zrt. 1075 Budapest, Madách Imre út 13-14. Newsletter distribution system operator, MiniCRM Zrt. 1075 Budapest, Madách Imre út 13-14. MiniCRM - CRM system operator,
Recipients	

Data is transferred to a third country (outside the EU):

Name of data processor, place of transfer, guarantees of transfer, reason for transfer

Joint processing takes place:

Answer	Name and registered seat of the joint controller
No	

Access to data and data security measures:

Restricting access	Only those employees have access to personal data who are in absolute need of this information to perform their work duties, typically the marketing, sales and customer service staff. The company ensures this through authorization management.
Data security measure	HTTP security protocol on the website Antivirus software on computers, regular backups of data stored on the server Computers are password protected Password protected Wi-Fi network The network is protected by a firewall Changing passwords at regular intervals is mandatory Uninterruptible power supply is provided for the company's servers and critical workstations Authorization management and its regular review Password protection of applications and software Two-factor authentication for logging into certain software

3. Rights of the Data Subject:

Rights of data subjects relating to the legal basis and an explanation of these rights
<p>Right to information: The Data Subject has the right to be informed about the way in which personal data are processed before the processing starts</p> <p>Right of rectification: The Data Subject has the right to request the rectification of his or her personal data if the personal data held by the Controller are inaccurate and he or she can prove this</p> <p>Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her</p> <p>Right to erasure, right to be forgotten: The Data Subject has the right to obtain the permanent erasure of his or her data, unless the processing is based on the performance of a contract, the fulfilment of a legal obligation or the exercise of official authority</p> <p>Withdrawal of consent: Where processing is based on consent, the Data Subject may withdraw his or her previously given consent at any time. Acceptance of a withdrawal request may also imply erasure of the data, but where there is another legal basis supporting the processing, the processing will cease only in relation to the specific purpose of the processing</p> <p>Right to restriction: If the Data Subject does not consider the Controller to be entitled to process his or her personal data, he or she may request the suspension of the processing during the investigation</p> <p>The right to data portability: The Data Subject has the right to request the personal data stored about him or her in digital, tabular form</p>

Right to review of automated decision-making: The Data Subject has the right to request a manual review of any processing operation where the controller has used automated decision-making with legal effect on the Data Subject

4. Exercise of data subject rights

Where the data subject has made a request to the controller in relation to the exercise of his or her rights as described in point 3, the controller shall respond without undue delay, but no later than one month from the receipt of the request, and inform the data subject of the action taken on the request. If necessary, this period may be extended by a further two months.

If the Controller fails to act on the data subject's request, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the right to lodge a complaint with the supervisory authority and to seek judicial redress.

5. Lodging a complaint

The data subject has the right to lodge a complaint with the data protection authority:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
Seat	H-1055 Budapest, Falk Miksa utca 9-11.
Postal address	1363 Budapest, Pf.9.
Email	ugyfelszolgalat@naih.hu
Phone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial redress

The provisions on judicial redress are in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

The data subject may go to court against the controller in order to protect his or her data if he or she considers that the controller has infringed the provisions on the processing of personal data. The data subject may choose to bring the action before the tribunal having jurisdiction over the place where he or she lives or resides. A person who does not otherwise have legal ability in the lawsuit may also be a party to the lawsuit. The data protection authority may intervene in the lawsuit in order to ensure that the data subject is successful.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the General Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.