

DATA PROCESSING NOTICE

Social media data processing Processing of followers and likes

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
Public data and comments available in the personal profiles of followers and users who are active on the page So-called event data managed by Facebook Name, telephone number, Email address, Postal code	Promoting the data controller's work on social media sites, managing followers, reactions, comments, providing information, sharing content, establishing relationships, networking, brand building Sending targeted ads, campaigns, ad optimization, using statistics, online lead generation, acquiring new customers, increasing sales, marketing inquiries based on submitted forms	Consent of the data subject - Article 6(1)(a) GDPR	Until the consent is withdrawn/deletion of the post by the data subject, or until the social networking site is operational at the latest. For more detailed information, please see the data processing notice of the social networking site. The data controller does not store personal data when using social platforms. It has access to the data in the course of managing the site, or indirectly through certain social media services (e.g. advertising) - it does not have direct access to these.

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
<i>Processors (performing technical tasks related to data processing operations)</i>	Meta Platforms Ireland Limited 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland Facebook, Instagram social media, X International Unlimited Company 1 Cumberland Place, Fenian Street, Dublin 2, Dublin, D2, Dublin, Ireland Twitter social media, Google LLC 1000 Cherry Avenue, San Bruno, CA 94066, United States Youtube social media, LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland LinkedIn Social Media
<i>Recipients</i>	

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

Name of data processor, place of transfer, guarantees of transfer, reason for transfer
Meta Platforms Ireland Limited,USA,Privacy Policy Data Privacy Framework, https://hu-hu.facebook.com/privacy/policy https://www.dataprivacyframework.gov/list ,possible access by parent company, data storage, X International Unlimited Company,USA,Privacy Policy Data Privacy Framework, https://x.com/en/privacy ,possible access by parent company, data storage, Google LLC,USA,Privacy Policy Data Privacy Framework, https://policies.google.com/privacy?hl=hu&fg=2 ,data storage, LinkedIn Ireland Unlimited Company,USA,Privacy Policy Data Privacy Framework, https://www.linkedin.com/legal/privacy-policy ,possible access by parent company, data storage

Joint processing takes place:

Answer	Name and registered seat of the joint controller
Yes	

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, so data can be accessed typically by the sales, marketing and customer service staff and management. Data shared on online platforms is public data, accessible to anyone.
Data security measure	Alarm, Unauthorized person cannot enter the office Key management - rights management Closed document storage, closed archive Security camera system Safe deposit box 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 Private use of IT equipment is prohibited Employee confidentiality agreement signed It is mandatory to turn off the screen when the employee leaves their workstation

	Employees must immediately report the loss or damage of IT devices and data carriers to their superior or a designated person It is mandatory to keep documents that are not in use during work in a locked place. Password protection of applications and software Two-factor authentication for logging into certain software
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3. Rights of the Data Subject:

Rights of data subjects relating to the legal basis and an explanation of these rights
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 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 Right of access: The Data Subject has the right to obtain from the Controller the personal data held about him or her 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 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 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 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 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

Victofon Hallásjavító Kft. 1068 Budapest, Szondi u. 98/a. fszt.2.
e-mail: ugyfelszolgalat@victofon.hu
website: <https://victofon.hu/hu>
telephone: +36 30 311 4123



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.

By visiting the controller's social media site or initiating an activity, the data subject simultaneously consents to the processing and storage of his or her provided data in accordance with the provisions of this data processing notice.