

## PRIVACY POLICY

### I. Introduction

The controller agrees to be bound by the terms and provisions of this policy. He agrees and promises that all data management processes carried out in connection with its activities will be in compliance with this policy and the requirements set out in the applicable regulations as in effect from time to time. The data and contact details are contained in Chapter IV of this document. The data protection guidelines related to data controlling are available on website [www.meditourshungary.com](http://www.meditourshungary.com).

The controller reserves the right to amend this policy at any time. Naturally, users will be informed about such modifications in due time.

If this policy does not provide a clear answer to any question you may have, please write to us and we will be pleased to answer your questions.

The controller is committed to protecting the personal data of its customers and partners and places special emphasis on respecting its customers' right to privacy. He will keep the personal data in confidence and take all security, technical and organizational measures to guarantee the safety and security of such data.

The data controlling principles and the requirements he has set for himself as a data controller are detailed below.

The controller's data management principles will always be in compliance with the EU and Hungarian regulations on data protection, as they may be in effect from time to time, including in particular:

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 (general data protection regulation)

Act CXII of 2011 on informational self-determination and freedom of information, "Information Act";

Act XLVII of 1997 on the processing and protection of medical data and related data

### II. Registration:

You agree that:

You will keep your username and password safe, and won't share them with anyone.

You will not pass yourself off as someone else or create multiple, false accounts.

Your registration at Medi Tours Hungary automatically subscribes you to our Medi Tours Hungary newsletter. If you wish to unsubscribe to this service at any time, click on the unsubscribe link at the bottom of each newsletter.

### III. Cases of data controlling

#### 1.) COOKIE POLICY OF WEBSITE [WWW.MEDITOURSHUNGARY.COM](http://WWW.MEDITOURSHUNGARY.COM)

Data Subjects: visitors and users of [www.meditourshungary.com](http://www.meditourshungary.com) website

Purpose of data controlling: to identify users, distinguish them from one another as well as to keep track of their current session, to store data provided during a session and to prevent data loss.

Legal grounds for data controlling: the data subjects' consent, which is granted or rejected by

turning on or off the relevant settings in their browser.

Range of data managed: identification number, date and time.

The controller uses cookies during its services for the following purposes:

management of individual user sessions;

storing the language selected;

recording accessibility settings;

recording the time spent on the client side. Additionally, cookies that are used by program elements developed by third parties (such as JavaScript folders) may also be created during the use of website [www.meditourshungary.com](http://www.meditourshungary.com).

Duration of data controlling: maximum one month, or in the case of cookies designed to prevent data loss, until the end of the relevant session.

In order to provide customized services, the controller creates and reads small data files (cookies) on the user's computer. If the browser returns a previously saved cookie, the service provider processing the cookie can link the user's current visit to previous visits, but only in respect of its own content. Users can delete cookies from their computers or disable cookies in their browsers. If you fail to do so or if you click on the button "Approve", you accept the use of cookies. Cookies can be usually controlled in the Tools/Settings/Privacy menu of browsers. Deleting or disabling cookies during a session may render certain functions of the [www.meditourshungary.com](http://www.meditourshungary.com) unavailable.

## 2.) DATA MANAGEMENT OF SUBSCRIPTIONS FOR NEWSLETTER

Data Subjects: subscribers for newsletter on website [www.meditourshungary.com/](http://www.meditourshungary.com/)

Purpose of data controlling: delivery of electronic newsletters providing current information on healthy living&lifestyle, travel Hungary and containing notification of Medi Tours Hungary special offers. The controller may use the personal data provided by the data subject only for sending the newsletter; the data shall not be used for any other purpose.

Legal grounds for data controlling: voluntary consent of the data subject as set out in section 5 (1) a) of the Information Act. By subscribing for the newsletter the data subject shall voluntarily and explicitly agree to controlling his personal data and state that he has read and understood the privacy policy.

Range of data managed: name, e-mail address, gender and date of birth

Persons authorized to control data: only the controller indicated in Chapter IV; no other person shall be authorized to access to the personal data.

Duration of data controlling: the data subject may delete his registration at any time by clicking on the 'unsubscribe' button, as a result his personal data will be deleted.

The data subject may reject the receipt of the newsletter or request for deletion or modification and rectification of his personal data at the following addresses; by post: 1125 Budapest, Rozse u. 18, or via e-mail at the address: [info@meditourshungary.com](mailto:info@meditourshungary.com), by indicating in the relevant field prohibition of delivery of the newsletter/prohibition of controlling personal data/ modification/rectification of personal data. The data subject may request for prohibition of controlling or deletion, modification or rectification of his personal data only in writing so as to enable the controller to ascertain the authenticity of the registrant. In the case of an email request, the registrant must send the email via the already registered email address in the Medi Tours

Hungary system.

There will be no data processor.

Registration number of the data control: NAIH-98123/2016

### 3.) USE OF MEDI TOURS SYSTEM AND DATA CONTROL DURING ITS USE

Data Subjects: users registration on the Medi Tours Hungary website [www.meditourshungary.com/](http://www.meditourshungary.com/)

Purpose of data controlling: records of users, their distinction from one another, communications, providing preliminary opinion on current state of fitness for making special individual offers.

Legal grounds for data controlling: voluntary consent of the registrant according to section 5 (1) a) and (2) a) of the Information Act. By registration in the Medi Tours Hungary system the data subject shall voluntarily and explicitly consent to controlling his personal data and state that he has read and understood the privacy policy. By completing the Health Questionnaire, aiming at forming preliminary opinion on state of fitness, the data subject shall state that he has read and understood the privacy policy.

Range of data managed: name, e-mail address, address, telephone, gender, date of birth, body height/weight, addictions, accidents, diseases, medications, and photo. The controller shall handle personal data no other than those provided by the data subject. The data subject shall be liable for the accuracy of the personal data provided by him; he shall bear full liability for inaccuracy.

Persons authorized to control data: only the controllers indicated in Chapter IV shall be authorized to obtain and transfer the personal data to consultants and medical professionals contracted with the controller according to this policy. No other person shall be authorized to access to the personal data of the data subject.

Range of data managed: the data subject may delete all his medical data or pictures provided by him on the Health Questionnaire or Pictures page, by deletion of the registration all the personal data shall be deleted. Automatic deletion of the registration if there is no login within 1 year. All data, except name and email address, is automatically deleted after 1 year of entry or upload.

By prohibiting the use and by deleting the personal information shall mean the termination of the registration. The data subject may prohibit the use and delete his personal data by deleting the registration, which can be requested at the following addresses - by post: 1125 Budapest, Rozse u. 18 or via e-mail: [info@meditourshungary.com](mailto:info@meditourshungary.com), by indicating in the subject field 'Request Data Deletion and Use'. The data subject may modify or rectify his personal data under the personal info menu item in the Medi Tours Hungary system or he may request it by post at the address: 1125 Budapest, Rozse u. 18 or via e-mail: [info@meditourshungary.com](mailto:info@meditourshungary.com) by indicating in the relevant field: 'Request for Modification of Personal Data'. The registrant may request for prohibition of controlling or for the deletion, modification or rectification of his personal data only in writing so as to enable the controller to ascertain the authenticity of the registrant. In the case of an email request, the registrant must send the email via the already registered email address in the Medi Tours Hungary system.

There will be no data processor.

Registration number of the data management: NAIH-98124/2016

## IV. STORAGE OF PERSONAL DATA AND DATA SECURITY

The controller's information technology systems and other data storage facilities are located at its registered office and branch offices, at a leased location or at the registered office and branch offices of its internet service provider or the subcontractors of such internet service provider.

The controller selects and operates the information technology devices used for the purposes of his services with a view to ensuring that the data managed are accessible only for the authorized parties and prevented from unauthorized access, modification, transfer, disclosure, deletion, etc.

## V. DATA AND CONTACT DETAILS OF THE CONTROLLER

Randall Simor e.v

1125 Budapest, Rozse u. 18

[www.meditourshungary.com](http://www.meditourshungary.com)

[info@meditourshungary.com](mailto:info@meditourshungary.com)

## VI. DATA PROCESSORS

No data processors will be hired by the controller.

## VII. REMEDIES

Data Subjects may request information on their personal data being managed, the source thereof, the purpose, legal grounds and duration of the control as well as on the legal grounds and addressee in the case of data transfer. The data manager shall provide the requested information in writing, in a form easy to understand, within the shortest possible time but not later than within 25 days of the receipt of such request. The information shall be free of charge if the person asking for information has not submitted a request for information to the data manager yet. In other cases a fee may be charged for the expenses of the data manager.

Upon request the controller shall rectify any personal data if they are untrue and inaccurate and the true and accurate data are available. The controller may block the personal data instead of deletion if it is requested by the data subject or if the unavailable information allows to presume that such deletion would violate the lawful interests of the subject. The blocked personal data may be controlled as long as the purpose of the control precluding the deletion of the personal data is in existence.

The controller shall mark the personal data managed by him if the data subject contests the accuracy thereof but the accuracy of the personal data cannot be established clearly. The controller shall delete the personal data if their management is illegal, or if it is requested by the data subject or if the managed data are incomplete or inaccurate and this condition cannot be remedied according to the law provided that the deletion is not precluded by law, the purpose of the data control has terminated, the time specified in law for the storage of data has expired or if it has been ordered by court or National Authority for Data Protection and Freedom of Information. The controller may take 25 days for the deletion, blockage or rectification of the personal data. If the controller fails to grant the request for the rectification, blockage or deletion submitted by the data subject within 25 days, the controller shall notify the data subject of the reasons for the rejection.

The controller shall notify the data subject and all the other persons for whom the personal data have been transferred for the purpose of data management of the rectification, blocking, marking and deletion of the personal data. The notification shall be disregarded if it not conflicting with the lawful interest of the data subject.

The data subject may make objection to controlling his personal data if the control or transfer of the personal data is required only for compliance with any legal obligation pertinent to the controller or only for enforcement of the legitimate interest of the controller, data

importer or third party unless the control has been ordered by law;  
the personal data are used and transferred for the purpose of direct marketing, public opinion poll or scientific research;  
another cases specified in law.

The controller shall review the request within the shortest possible time but not later than within 15 days of the receipt thereof, he shall pass a resolution on the soundness of the request and notify the petitioner in writing. In case the controller finds the sound foundations of the request of the data subject, the controller shall suspend the data management, including any additional data survey and transfer, he shall block the personal data and notify all the persons for whom the personal data have been transferred before of the objection and the measure taken according to that, in addition such persons shall take action for the enforcement of the right to object.

If the data subject disagrees with the resolution of the controller, the data subject may seek remedy before court or exercise his right to remedy with the National Authority for Data Protection and Freedom of Information within 30 days of the notification: Name of the Authority: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information), registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C, website: <http://www.naih.hu>, Phone: +36.1.391.1400, Fax: +36.1.391.1410, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu). The data subject may go to law in the case of violation of his rights, the court shall proceed out of order.