

Pekaru.hu

Privacy Notice

Introduction

P&P Pékáru Kft. (6100 Kiskunfélegyháza, X. Ker. 92/B., tax number: 11424372-2-03, Company registration number: 03-09-105053) (hereinafter: Service provider, controller) hereby submits to this Privacy Notice.

In compliance with 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, we hereby inform you as follows.

This privacy notice regulates the processing of data on the following websites: www.pekaru.eu, www.pekaru.eu, www.goldenbakery.eu

The Privacy Notice is available on this website: <http://www.pekaru.hu/adatvedelem>

Any amendments to this notice shall take effect upon publication on the above website.

THE CONTROLLER AND ITS CONTACT INFORMATION:

Name: P&P Pékáru Kft.

Registered office: 6100 Kiskunfélegyháza, X. Ker.

92/B. E-mail: pppekaru@pekaru.hu

Telephone: +36/76 587-800

DEFINITIONS

1. 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclose by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
3. 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
4. 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
5. 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
6. 'consent of the data subject' means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
7. 'data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Personal data must be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('limitation of purpose');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- e) kept in such form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

The controller shall be responsible for, and be able to demonstrate compliance with, the principles described above ('accountability').

DATA PROCESSING

SENDING MESSAGES, ESTABLISHING CONTACT

1. The fact of the data processing, the type of data processed and the purpose of data processing:

Personal data	Purpose of data processing
Name, e-mail address, telephone number.	Keeping contact, identification.
Date of sending message	Carrying out technical operations.
IP-address at the time of sending the message	Carrying out technical operations.

2. Data subjects: All data subjects sending a message/enquiring on the website.

3. Duration of data processing, deadline for erasing data: Data processing lasts until the given matter is resolved.

4. Data controllers entitled to access the processed data: Personal data may be processed by the controller in compliance with the above principles.

5. **Information about the rights of data subjects concerning data processing:**

- The data subject has the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject, and
- to object to processing of such personal data, and
- the data subject has the right to portability, as well as to withdraw his or her consent at any time.

6. You can request the erasure or modification of your personal data by one of the means below:

- by mail at the address 6100 Kiskunfélegyháza, X. Ker. 92/B,
- by email to pppekaru@pekaru.hu
- by telephone at +36/76 587-800.

7. The legal basis of data processing: the data subject's consent, paragraph (a) of Section 1 of Article 6 of the GDPR and Subsection (1) of Section 5 of the Infotv.

8. We hereby inform you that

- **data processing is based on your consent.**
- **you must** provide your personal data so that we can reply to your message.
- failure to provide the required data may have the **consequence** that we will be unable to satisfy your request.

APPLICATION FOR AN OPEN POSITION

1. The fact of the data processing, the type of data processed and the purpose of data processing:

Personal data	Purpose of data processing
Name, e-mail address, telephone number.	Keeping contact, identification. Selection, recruitment, filling an announced position, notification of future job offers.
Date of birth	Selection, identification, statistics, recruitment, filling an announced position.
Personal data contained in the CV (e.g. home address, place and date of birth, phone number, education level, language skills, field practice, employment history, hobbies).	Selection, recruitment, filling an announced position.
Date of application	Carrying out technical operations.
IP-address at the time of the application	Carrying out technical operations.

2. Data subjects: All data subjects who submitted a job application.
3. Duration of data processing, deadline for erasing data: The controller processes personal data for 1 year (or until an erasure request is received from the data subject).
4. Data controllers entitled to access the processed data: Personal data may be processed by the controller's HR assistant in compliance with the above principles.
5. **Information about the rights of data subjects concerning data processing:**
- The data subject has the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject, and
 - to object to processing of such personal data, and
 - the data subject has the right to portability, as well as to withdraw his or her consent at any time.
6. You can request the erasure or modification of your personal data by one of the means below:
- by mail at the address 6100 Kiskunfélegyháza, X. Ker. 92/B,
 - by email to pppekaru@pekaru.hu
 - by telephone at +36/76 587-800.
7. The legal basis of data processing: the data subject's consent, paragraph (a) of Section 1 of Article 6 of the GDPR and Subsection (1) of Section 5 of the Infotv.
8. We hereby inform you that
- **data processing is based on your consent.**
 - **you must** provide your personal data so that we can reply to your application failure to provide the required data may have the **consequence** that we will be unable to receive your application.

SUBPROCESSORS

Storage (server) provider

1. Activities performed by the processor: Providing storage and server services

2. Processor's name and contact information:

Silicon Dreams Kft.

registered office: 6000 Kecskemét, Kőhíd u.
12 I/1

tax number: 11425971-2-03

Company registration number: 03-09-105263

www.silicondreams.hu 36-70/334-9787

info@sziliciumalmok.hu

Our server provider:

UNAS Online Kft.

registered office: H-9400 Sopron, Major köz 2. I/15

tax number: 14114113-2-08

www.unas.hu

36-99/200-200

unas@unas.hu

3. The fact of data processing, the type of data being processed: All personal data specified by the data subject.
4. Data subjects: All data subjects using the website.
5. The purpose of data management: To provide access to the website and ensure its proper operation.
6. Duration of data processing, deadline for erasing data: Data is processed until the termination of the contract between the controller and the storage (server) provider or until the data subject requests the storage (server) provider to erase his or her data.
7. Legal basis for processing: the User's consent, Subsection (1) of Section 5 of the Infotv., paragraph (a) of Section 1 of Article 6 of the GDPR and Subsection (3) of Section 13/A of Act CVIII of 2001 on certain legal aspects of services associated with information society.

MANAGING COOKIES

1. The fact of data processing, the type of data being processed: Individual ID number, dates, times:
2. Data subjects: All data subjects visiting the website.
3. The purpose of data management: Identification of users and tracking visitors:
4. Duration of data processing, deadline for erasing data:

Type of cookie	Legal basis of data processing	Data processing Duration	Types of data being processed:
Session cookies	Subsection (3) of Section 13/A of Act CVIII of 2001 on certain aspects of electronic commercial services and services related to the information society	The period lasting until the visitor's session is closed	connect.sid

5. Data controllers entitled to access the processed data: The controller does not process personal data by using cookies.
6. Information about the rights of data subjects concerning data processing: The data subject has the opportunity to delete cookies in the Tools/Settings menu of the browser, usually under the Privacy settings.
7. The legal basis of data processing: No consent is required from the data subject if cookies are used exclusively for the purpose of transmitting messages through the electronic communications network or if it is absolutely necessary for the service provider in order to provide services relating to information society specifically requested by the subscriber or user.

USING GOOGLE ANALYTICS

1. This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses 'cookies' i.e. small text files placed on your computer, to help the website analyze how users use the site.
2. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area.
3. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider.
4. Google Analytics will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=hu>

COMMUNITY WEBSITES

1. The fact of data collection, the type of data being processed:
Your name and public profile picture registered on social media sites such as Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc.
2. Data subjects: All data subjects who registered on social media sites such as Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. and 'liked' the website.
3. The purpose of data collection: Sharing, liking certain elements, products, promotions on social media sites or other websites or sharing or 'liking' or promoting the website itself.
4. Duration of data processing, deadline for erasing data, the identity of controllers entitled to access data, and description of the rights of data subjects relating to processing: The data subject may obtain information about the source and processing of data, the way it is transferred and the legal basis of processing on the relevant social media site. Data processing is carried out on the social media site, therefore the duration and mode of data processing and the opportunities to erase or modify data are governed by the regulations of the given social media site.
5. The legal basis of data processing is the data subject's voluntary consent to the processing of their data on social media sites.

CUSTOMER RELATIONS AND OTHER DATA PROCESSING

1. If during the use of the controller's services you have any questions, you can contact the controller via the contact details provided on the website (telephone, email, social media sites etc.).
2. The controller shall erase any received emails, messages and any data provided by phone, on Facebook etc. together with the enquirer's name and email address and any other voluntarily provided personal data on expiry of 2 years after disclosure at the latest.
3. We will inform you about any data processing not mentioned in this notice when the relevant data is recorded.
4. The Service Provider may be obliged to disclose information and documents on request by the relevant authorities or by other entities authorized by the law to make such request.
5. In such a case, the controller may disclose personal data to the requesting entity only to such extent which is absolutely necessary for achieving the purpose of the data request, provided that the requester has specified the exact purpose and the scope of data requested.

RIGHTS OF DATA SUBJECTS

1. **Access right**

You have the right to obtain from the controller confirmation as to whether or not your personal data are being processed, and, where that is the case, access to such personal data as well as to the information specified in the Regulation.

2. **Right to rectification**

You have the right to obtain from the controller without undue delay the rectification of your inaccurate personal data. Taking into account the purposes of the processing, you have the right to have any incomplete personal data completed, including by means of providing a supplementary statement.

3. **Right to erasure**

You have the right to obtain from the controller the erasure of your personal data without undue delay and the controller shall have the obligation to erase personal data without undue delay where certain conditions have been met.

4. **Right to be forgotten**

Where the controller has made the personal data public and is obliged to erase the same, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

5. **Right to restriction of processing**

You have the right to obtain from the controller restriction of processing of your personal data where one of the following applies:

- you contest the accuracy of the personal data, in which case the restriction shall apply for a period enabling the controller to verify the accuracy of the personal data;
- data processing is unlawful and you oppose the erasure of personal data and request the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but you request them for the assertion, exercise or defence of legal claims;
- you have objected to data processing, in which case the restriction shall apply until it is verified whether the legitimate grounds of the controller override yours.

6. Right to data portability

You have the right to receive any of your personal data you have provided to the controller, in a structured, commonly used and machine-readable format, and also have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (...)

7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data (...), including profiling based on those provisions.

8. Objection in case of direct marketing

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to the processing of your personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

9. Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

The previous paragraph shall not apply if the decision:

- is necessary for entering into, or performance of, a contract between you and the data controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- is based on your express consent.

DEADLINE FOR TAKING ACTION

The controller shall inform you about the measures taken by it as a result of your request without any delay but no later than **within 1 month** after the receipt of your request.

Where necessary **this can be extended by 2 months**. The controller shall inform you of any such extension **within 1 month** of receipt of your request, together with the reasons for the delay.

If the controller does not take action on your request, **the controller shall inform you, without delay and at the latest within one month of receiving your request, of the reasons for not taking action** and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

SECURITY OF PROCESSING

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymization and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

COMMUNICATION OF A PERSONAL DATA BREACH TO THE DATA SUBJECT

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

When informing the data subject, the controller shall describe the personal data breach **clearly and intelligibly** to the data subject; communicate the name and contact details of the data protection officer or other contact point where more information can be obtained; describe the likely consequences of the personal data breach; and describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The data subject does not have to be informed if any of the following conditions are met:

- the controller **has implemented appropriate technical and organizational protection measures**, and those measures were applied to the personal data affected by the personal data breach, in particular those that **render the personal data unintelligible** to any person who is not authorised to access it, such as encryption;

- after a data breach, the controller has taken additional measures which **ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialize**;
- it would involve a **disproportionate effort**. In such a case, there shall be a public communication or similar measure instead whereby the data subjects are informed in an equally effective manner.

If the controller has not communicated the personal data breach to the data subject yet, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so.

REPORTING A DATA BREACH TO THE AUTHORITIES

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

OPPORTUNITY TO FILE A COMPLAINT

You can file a complaint against any infringement by the controller with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of
Information 1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Mail Address: 1530 Budapest, POB. 5.
Telephone: +36 -1-391-1400 Fax:
+36-1-391-1410 E-mail:
ugyfelszolgalat@naih.hu

CONCLUSION

In making this Notice, the following legal acts were taken into consideration:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th, 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.
- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: Infotv.)
- Act CVIII of 2001 on certain aspects of electronic commercial services and services related to the information society (particularly the provisions of Section 13/A)
- Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (particularly the provisions of Section 6)
- Act XC of 2005 on the Freedom of Information by Electronic Means
- Act C of 2003 on Electronic Communications (in particular Section 155)
- Opinion 16/2011 on EASA/IAB Best Practice Recommendation on Online Behavioral Advertising
- Recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the privacy requirements of preliminary notification
- Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th, 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.