

# PRIVACY POLICY

The operator of xmeditor.hu, X-Meditor Ltd. (9023 Győr, Csaba Street 21., hereinafter referred to as the service provider, data controller), acknowledges the content of this legal notice as mandatory for itself. It undertakes to ensure that all data processing related to its activities complies with the provisions of this policy and the expectations set by applicable laws.

X-Meditor Ltd. is committed to protecting the personal data of its users and partners, placing particular importance on respecting the informational self-determination rights of its customers. As the operator and data controller of this website, X-Meditor Ltd. treats personal data confidentially and implements all necessary security, technical, and organizational measures to ensure the security of data.

In this document, the operator outlines its data processing principles, activities, and rules related to the data managed by the site.

The data processing principles related to the operation of the website are in accordance with current data protection laws, including, in particular, the following:

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 (hereinafter referred to as Infotv., data protection law)

Act C of 2001 on Electronic Commerce Services and Services Related to the Information Society (Eker. tv.)

Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities (Grt.).

## 1., 1. Definitions and Definitions

1.1. data subject: any identified or – directly or indirectly – identifiable natural person based on specific personal data;

1.2. personal data: data that can be linked to the data subject – in particular, the name of the data subject, identifier, and one or more physical, physiological, mental, economic, cultural, or social characteristics specific to the data subject – and any inference drawn from such data concerning the data subject;

1.3. consent: the voluntary and explicit expression of the data subject's wish, based on appropriate information, by which the data subject gives unequivocal consent to the processing of his or her personal data – in full or for specific operations;

1.4. objection: the statement by the data subject objecting to the processing of his or her personal data and requesting the termination of data processing or the deletion of processed data;

1.5. data controller: a natural or legal person or an organization without legal personality who or which independently or jointly with others determines the purpose of data processing, makes and executes decisions related to data processing (including the means used), or performs it through its appointed data processor;

1.6. data processing: any operation or set of operations on data, regardless of the method or means used for the operations, including collection, recording, organization, storage, alteration, use, querying, transmission, disclosure, coordination, or linking, blocking, erasure, and destruction of data, as well as preventing further use of the data, taking a photograph, sound or image recording, and recording physical characteristics suitable for the identification of the person (e.g., fingerprints, DNA samples, iris images); 1.7. data transmission: making data accessible to a specific third party;

1.8. disclosure: making data accessible to anyone;

1.9. data erasure: making data unrecognizable in a way that their restoration is no longer possible;

1.10. data marking: identifying data with a distinctive mark for the purpose of differentiation;

1.11. data blocking: marking data with an identifier for the purpose of permanently or for a specified period restricting their processing;

1.12. data destruction: the complete physical destruction of the data carrier containing the data;

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1.13. data processing: the performance of technical tasks related to data processing, regardless of the method and means used for the operations, as well as the location of the application, provided that the technical task is carried out on the data;

1.14. data processor: a natural or legal person, or an organization without legal personality, who or which, based on a contract with the data controller – including contracting under a legal provision – processes the data;

1.15. third party: any natural or legal person, or an organization without legal personality, who or which is not the data subject, the data controller, or the data processor;

1.16. third country: any state that is not a member of the EEA.

### 2., Data Processing Principles in the Operation of the Website

Personal data may be processed if:

- a) the data subject consents to it, or
- b) it is required by law or, based on the authorization in the law, a local government regulation orders it for a purpose based on public interest (mandatory data processing).

Personal data may also be processed if obtaining the consent of the data subject is impossible or would involve disproportionate costs, and the processing of personal data is necessary to fulfill a legal obligation incumbent on the data controller, or it is necessary to enforce the legitimate interest of the data controller or a third party, and the enforcement of this interest is proportionate to the limitation of the data subject's right to the protection of personal data.

If personal data are recorded with the consent of the data subject, the data controller may process the recorded data further:

- a) for the purpose of fulfilling the legal obligation incumbent on it, or
- b) for the purpose of enforcing the legitimate interest of the data controller or a third party, if the enforcement of this interest is proportionate to the limitation of the right to the protection of personal data, even without additional consent and after the withdrawal of the consent of the data subject.

Personal data may only be processed for a specific purpose, for the exercise of rights, and for the fulfillment of obligations.

At every stage of data processing, it must comply with this purpose, and the collection and processing of data must be fair.

Only personal data that is essential for the realization of the purpose of data processing, suitable for achieving the purpose, and only to the extent and duration necessary for the realization of the purpose may be processed. Personal data may only be processed based on the voluntary and informed consent of the data subject. Before starting data processing, the data subject must be informed whether the data processing is based on consent or is mandatory. The data subject must be informed – clearly, comprehensibly, and in detail – about all facts related to the processing of his or her data, in particular about the purpose and legal basis of data processing, the activities and rules related to the data processed by the website, the data controller or the person entitled to process the data, the duration of data processing, whether the data controller processes the personal data of the data subject with the consent of the data subject and for the fulfillment of the legal obligation incumbent on the data controller or for the enforcement of the legitimate interest of a third party, and about who may have access to the data. The information must also cover the data subject's rights related to data processing and the options for legal remedies.

During data processing, it must be ensured that the data are accurate, complete, up-to-date, and that the data subject can only be identified for the time necessary for data processing.

Personal data may be transferred to a data controller or data processor conducting data processing activities in a third country if the data subject has expressly consented to it or if the conditions prescribed for data processing are met. In such cases, the processing and handling of transferred data in the third country must ensure an adequate level of protection for personal data. The transmission of data to EEA countries should be considered as if it were an internal data transfer within Hungary.

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### 3., Scope of Processed Personal Data and Characteristics of Data Processing

The data processing activities of xmeditor.hu website are based on voluntary consent. However, in certain cases, legal obligations may make it mandatory to process, store, or transmit specific data, and visitors/users will be duly informed about such cases.

#### 3/1. Data of Visitors to xmeditor.hu Website

Purpose of Data Processing: During website visits, the hosting provider records visitor data for the operation control of the service and prevention of misuse.

Legal Basis for Data Processing: Consent of the data subject and the Act CVIII of 2001 on certain issues of electronic commerce services.

Processed Data: Date, time, IP address of the user's computer, visited page address, previously visited page address, data related to the user's operating system, and browser.

#### Cookie Policy:

External service providers place and read small data packages, known as cookies, on the user's computer for personalized service. If the browser sends back a previously stored cookie, the providers handling it have the capability to link the user's current visit with previous ones, but exclusively in terms of their own content..

The xmeditor.hu website does not use web beacons.

Google Analytics cookies are used for independent measurement and auditing of website traffic and analytics.

Google Analytics Cookie Information: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Google and Facebook Cookies: Cookies placed by Google and Facebook serve the display of targeted advertisements.

General Google Cookie Information: <https://policies.google.com/technologies/cookies?hl=hu#types-of-cookies>

General Facebook Cookie Information:

[https://accountscenter.facebook.com/ad\\_preferences](https://accountscenter.facebook.com/ad_preferences)

Deleting Cookies:

Users can delete or restrict the application of cookies placed by the Data Controller and third parties (Google, Google Analytics, Facebook) on their computers.

Social Media

X-Meditor Kft. is present on Facebook, Instagram, and LinkedIn. Following and unsubscribing from these pages is voluntary. X-Meditor Kft. has access to the profiles of its followers on these social media platforms but does not use their data for any purpose.

#### 3/2. Data for Contact, Application, and Information Requests on xmeditor.hu

Purpose of Data Processing: Contact, communication, information requests.

Legal Basis for Data Processing: Voluntary consent of the data subject.

Processed Data: Name, email address, phone number, message subject, text, date and time, and other personal data provided by the data subject.

Data Deletion Deadline: Upon cessation of the purpose of data processing or withdrawal of consent.

#### 3/3. Subscription to the xmeditor.hu Newsletter

Purpose of Data Processing: Sending newsletters.

Legal Basis for Data Processing: Voluntary consent of the data subject.

Processed Data: Last name, first name, email address.

Data Deletion Deadline: Withdrawal of consent or cessation of the purpose of data processing.

Requests for the deletion or modification of personal data can be initiated through postal mail to X-Meditor Kft., 9002 Győr Pf. 156., or via email to [info@xmeditor.hu](mailto:info@xmeditor.hu).

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### Rights and Exercise of Users Regarding Data Protection:

Users' rights and obligations regarding data protection are outlined in Sections 14-21 of the Information Act. Users have the right to information and can request correction, deletion, or blocking of their data. In-depth information about rights and obligations can be found in the specified sections of the law on the following website: [http://njt.hu/cgi\\_bin/njt\\_doc.cgi?docid=139257.296244](http://njt.hu/cgi_bin/njt_doc.cgi?docid=139257.296244) (Sections 14-21).

### Legal Remedies Regarding Data Processing:

Legal remedies available to users affected by data processing are outlined in Sections 22-23 of the Information Act: <https://njt.hu/jogszabaly/2011-112-00-00>

For more detailed information on data processing, users can contact the Data Controller at [info@xmeditor.hu](mailto:info@xmeditor.hu) or the National Authority for Data Protection and Freedom of Information (Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, Mailing address: 1530 Budapest, Pf.: 5., Phone: +36 (1) 391-1400).

### 4., Storage of Personal Data and Data Processing

X-Meditor Kft.'s IT tools and data storage solutions are located at its headquarters (9023 Győr, Csaba u. 21.).

### 5., Data Controller's Information, Contact Information

Name: X-Meditor Kft. and employees performing job duties related to the performance of specific contracts.  
Headquarters: 9023 Győr, Csaba u. 21.  
Online Contact: [info@xmeditor.hu](mailto:info@xmeditor.hu)

### 6., Data Processor's Information, Contact Information

Name: X-Meditor Kft. and employees performing job duties related to the performance of specific contracts.  
Headquarters: 9023 Győr, Csaba u. 21.  
Online Contact: [info@xmeditor.hu](mailto:info@xmeditor.hu)

### 7., Remedies Available

For legal remedies or complaints, users can contact the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information  
1024 Budapest, Szilágyi Erzsébet fasor 22/C.  
Website: <https://www.naih.hu/>