

Privacy Notice

related to subscribing to the newsletter

The purpose of this Privacy Notice is to provide information to the data subject regarding the data processing activities related to sending newsletters to the data subject during the operation of the www.naunet.eu website, in accordance with Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).

1. Name of the Data Controller

Name of the Data Controller: VoidSec Limited Liability Company (VoidSec Kft.)

Registered office: 2903 Komárom, Tamási Áron utca 4.

Tax number: 27824881-2-11

Company registration number: 11-09-029548, registered by the Company Registry Court of the Tatabánya Regional Court

Represented by: Sándor Molnár, Managing Director, acting individually

E-mail address: info@naunet.eu

Telephone number: +36 30 829 2789

2. Purpose of Data Processing and Scope of Processed Data

Scope of Personal Data Processed	Purpose of Data Processing
Name E-mail address	Sending newsletters of the Data Controller to the data subject, informing the data subject of new features appearing on the website

3. Legal Basis of Data Processing

Data processing is based on Article 6 (1) (a) of the GDPR, i.e., the data subject has given consent to the processing of personal data for one or more specific purposes.

The data subject provides consent by ticking the “Consent” checkbox.

Consent must be confirmed by clicking on the link sent to the provided email address; subscription is finalized upon this confirmation.

Consent is voluntary and may be withdrawn at any time, without restriction and free of charge.

No automated decision-making or profiling takes place during data processing.

4. Source of Personal Data

Personal data is provided directly by the individual concerned (the data subject) to the Data Controller.

5. Recipients of Personal Data and Categories of Recipients

For sending newsletters, the Data Controller uses a data processor. The data processor’s registered office is located in a third country (USA); therefore, the Data Controller intends to transfer personal data to a third country (USA). The data transfer is carried out on the basis of the European Commission’s adequacy decision.

(https://commission.europa.eu/document/download/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en?filename=Adequacy%20decision%20EU-US%20Data%20Privacy%20Framework_en.pdf)

Name of data processor: Twilio SendGrid

Contact details: privacy@twilio.com, 101 Spear St, Ste 500, San Francisco, CA 94105

Link to privacy notice: <https://www.twilio.com/en-us/legal/privacy>

Binding Corporate Rules for data processing: <https://www.twilio.com/en-us/legal/bcr/processor>

6. Duration of Personal Data Storage, Unsubscribing

For the purposes described in this Notice, the Data Controller will process personal data until the data subject withdraws consent, after which the personal data will be deleted.

Withdrawal of consent is carried out by unsubscribing from the newsletter.

The data subject can unsubscribe from the newsletter by clicking on the “unsubscribe” link at the bottom of the newsletter, or by sending a separate withdrawal statement to the Data Controller’s email address. In such a case, the Data Controller will delete the data subject’s personal data and will no longer send any newsletters to the data subject.

Withdrawal does not affect the lawfulness of data processing carried out before withdrawal based on prior consent.

7. Consequences of Failure to Provide Data

If the data subject does not consent to the processing of personal data for the above purpose, the Data Controller will not send newsletters to them.

8. Rights of the Data Subject Related to Data Processing

8.1. Deadline

The Data Controller will fulfill the data subject’s request to exercise their rights within one month from the date of receipt of the request. The date of receipt of the request is not included in the deadline.

If necessary, considering the complexity of the request and the number of requests, the Data Controller may extend this deadline by an additional two months. The Data Controller will inform the data subject of any such extension and the reasons for the delay within one month of receiving the request.

8.2. Data Subject's Rights in Relation to Data Processing

8.2.1. Right of Access

The data subject is entitled, via the contact details provided in Section 1, to request information from the Data Controller as to whether their personal data is being processed, and if so, they have the right to be informed about:

which of their personal data is being processed by the Data Controller;

on what legal basis it is being processed;

for what purpose it is processed;

for how long it is processed, and also to know:

to whom, when, under which legal provision, and which of their personal data has been granted access or to whom their personal data has been forwarded by the Data Controller;

the source of the personal data;

whether the Data Controller applies automated decision-making, including profiling, and the logic involved.

Upon the data subject's request, the Data Controller will provide one free copy of the personal data undergoing processing. After that, a reasonable fee based on administrative costs may be charged.

To ensure compliance with data security requirements and to protect the rights of the data subject, the Data Controller is obliged to verify the identity of the data subject and of the person wishing to exercise the right of access. Therefore, providing information, allowing access to data, or issuing copies thereof is subject to identification of the data subject.

8.2.2. Right to Rectification

Via the contact details provided in Section 1, the data subject may request the Data Controller to modify inaccurate personal data relating to them, as long as the data remains under the Data Controller's processing. If the data subject can credibly prove the accuracy of the corrected data, the Data Controller will fulfill the request as soon as possible, but no

later than within one month, and will notify the data subject at the contact details provided by them.

8.2.3. Right to Restriction of Processing (Data Locking)

Via the contact details provided in Section 1, the data subject may request the Data Controller to restrict the processing of their personal data (marking the data with an indication that its processing is restricted, and ensuring it is processed separately from other data), if:

they contest the accuracy of their personal data (in this case, restriction applies for the period during which the Data Controller verifies the accuracy of the personal data);

data processing is unlawful, and the data subject opposes the erasure of the data and requests the restriction of its use instead;

the Data Controller no longer needs the personal data for the purposes of processing, but the data subject requires it for the establishment, exercise, or defense of legal claims;

the data subject has objected to the data processing (in which case the restriction applies while it is determined whether the Data Controller's legitimate grounds override those of the data subject).

8.2.4. Right to Object

Via the contact details provided in Section 1, the data subject may object to data processing if, in their view, the Data Controller is not processing their personal data appropriately in relation to the purpose specified in this Privacy Notice. In such a case, the Data Controller must demonstrate that the processing of personal data is justified by compelling legitimate grounds that override the interests, rights, and freedoms of the data subject, or that relate to the establishment, exercise, or defense of legal claims.

8.2.5. Right to Erasure

The data subject is entitled to have the Data Controller erase their personal data without undue delay upon request, and the Data Controller is obliged to erase the personal data without undue delay if any of the grounds set out in Article 17 (1) of the GDPR applies.

9. Right to Legal Remedies

If the data subject considers that the Data Controller has violated applicable data protection requirements during the processing of their personal data, they may:

lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9, e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu), or

seek judicial remedy to protect their data. In such a case, they may decide whether to submit their claim to the competent tribunal based on their place of residence (permanent address), place of stay (temporary address), or the registered office of the Data Controller. The tribunal competent for their place of residence or stay can be found at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.