

Privacy Policy

About [data processing related to the operation of](#) the <https://www.indebud.hu> service

Introduction

In accordance with the rules of the EU 2016/679 General Data Protection Regulation (GDPR), this Policy provides information on how **BUDAI ZSOLT Ev.** (hereinafter referred to as **Data Controller**) what activities it performs with the data of natural persons in connection with the operation of the <https://www.indebud.hu/> website, webshop and service. About the rules according to which it acts in the course of this activity and provides insight into its measures for the protection of the data used (processed). Last but not least, it provides information on all the rights that data subjects are entitled to in order to protect their interests.

The Data Controller shall provide the mandatory information pursuant to Article 13 of the GDPR to the data subjects and interested parties as follows.

1. Data of data controllers

Name: **Budai Zsolt Ev.**
Tax number: 59799207-1-31
Sole proprietorship number: 57844727
Headquarters: 2852, Kecskéd, Vasút utca 8.
E-mail: budai227@gmail.com
Phone: +3630 2811 898

Hosting provider: Webnode AG (Switzerland)
Customer service:
https://www.webnode.com/hu/login/?error=unauthorized&redirect_uri=https%3A%2F%2Fwww.webnode.com%2Fhu%2Flepj-kapcsolatba-velunk%2F
Data processing information: <https://www.webnode.com/hu/privacy-policy/>
Note: A hosting provider is a company based outside the EU that accepts the GDPR rules as binding on itself.

2. Principles of processing personal data

The Data Controller shall act in accordance with the following principles:

- *The principle of purpose limitation:* it shows the purpose for which the Data Controller stores and uses the data of natural persons in the course of its activities.
- *The principle of data minimisation:* that is, the scope of the processed data is appropriate for a given purpose and only to the extent necessary for it.
- *The principle of accuracy:* according to this, the Data Controller shall immediately correct or delete the personal data that are inaccurate for the purposes of the Data Subjects and for the sake of legal compliance.

The Data Controller receives the personal data directly from the data subjects. accepts that it is obligatory to perform the tasks related to the protection of personal data processed in connection with its activities, through which, where appropriate, it helps to prove to the Authorities, business partners and the customers concerned that the Regulation and the Info. Act and other relevant regulations (*principle of accountability*).

3. Definitions

GDPR: 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)

Personal data: any information relating to the data subject, such as an identifier, name, number, location data, online identifier or data concerning the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person.

Special data: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic and biometric data for the purpose of uniquely identifying natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons.

Data management: any operation or set of operations performed on personal data or data files, regardless of the procedure used, in particular collection, recording, organisation, structuring, storage, alteration, transformation, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure and destruction, access to data and preventing further use of data, photo, sound or data taking a picture and recording physical features that can identify a person (e.g. fingerprints or palm prints).

Data Controller: a natural or legal person, or an organisation without legal personality, who or which, independently or jointly with others, determines the purpose and means of the processing of personal data, makes and implements decisions concerning data processing, or has the data processor carry them out.

Data processor: a natural or legal person, or an organisation without legal personality, who or which processes personal data on behalf of the data controller.

Affected: any natural person identified or identifiable, directly or indirectly, on the basis of one or more factors, on the basis of any specified personal data. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors.

Data transfer: making personal data available to a specific third party. Data transfers to EEA Member States or bodies of the European Union shall be considered as if data were transferred within the territory of Hungary.

Data Deletion/Deletion: making data unrecognizable by deleting content or in a manner that allows for equivalent results.

Data breach: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

EEA Member State: a Member State of the European Union and another State party to the Agreement on the European Economic Area, as well as a State whose national enjoys the same legal status as a national of a State party to the Agreement on the European Economic Area on the basis of an international treaty concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area.

Third country: any state that is not an EEA member state.

NAIH: National Authority for Data Protection and Freedom of Information, the supervisory authority under the GDPR in Hungary.

4. Order of data processing

We process the personal data of business partners, employees and customers that we have become aware of in any way and to any extent in the course of our activities, in accordance with the provisions of this Privacy Policy, with a confidentiality obligation, in accordance with the provisions of the GDPR and the relevant Hungarian legislation.

We will terminate the data processing immediately if its purpose has been fulfilled or ceased, and we will consider it if the data subject requests it.

We do not use profiling or automated decision-making.

5. Details of data processing related to our activities, by purpose

5.1 [Contact Us](#)

Data subjects: anyone who initiates a contact by phone or e-mail, or on the website form

Source of the processed data: directly the data subject

Purpose of data processing: Contact, information

Data type	Legal basis	Retention period
Name	Article 6(1)(a) of the GDPR, Consent	Until the withdrawal of consent, but for a maximum of 5 years
Email address		
Phone number		

The process of data processing:

Your email address along with your first name is required for contact. We will only use your data for this purpose.

The above information is not mandatory, but without it, we will not be able to contact you. You may withdraw your consent at any time, without justification, but this does not affect the lawfulness of the data processing carried out earlier on the basis of consent. You can withdraw your decision by sending a letter to the above e-mail address, which we will complete in the shortest possible time, but within 5 working days at the latest.

5.2 [Conclusion of contracts](#)

Data subjects: anyone who accepts the terms and conditions of the service (according to the GTC)

Purpose of data processing: recording the acceptance of the GTC by the user, conclusion of the contract

Data type	Legal basis	Retention period
Email address	GDPR Article 6 (1) (b), performance of a contract	Until the termination of the contractual relationship.

The process of data processing:

By accepting the GTC, we can provide you with access to the service: concluding a contract. Providing this information (and later billing information) is an essential condition of the purchase.

5.3 [Handling of complaints related to data processing](#)

Data subjects: Natural persons who feel that their rights have been violated, data subjects

Purpose of data processing: Identification, conduct of the procedure and contact

Data type	Legal basis	Retention period
Name	Article 6 (1) (c) of the GDPR; Compliance with a legal obligation;	5 years after the closure of a given case
mother's name		
Email address	Regulation (EU) 2016/679 (GDPR)	

Phone number		
info. about the objected data processing		

The process of data processing:

With regard to the data processing carried out by the Data Controllers, all data subjects have the right to file a complaint if they feel that they have been harmed.

The provision of data is mandatory in order to investigate the injury and to maintain contact, i.e. to conduct the proper procedure. Without this, the complaint and/or the complainant cannot be identified, so we are not able to conduct the procedure.

5.4 Invoice management, accounting

Data subjects: persons named on the account

Purpose of data processing: Document management in accordance with the Accounting Act

Data type	Legal basis	Retention period
Name	GDPR Article 6(c); Compliance with a legal obligation; Act C of 2000 on Accounting	8 years after the date of the invoice
ev. tax number, registered office		

The process of data processing:

In the case of natural person clients and sole proprietors, the receipts may contain personal data. We store these data in accordance with the provisions of the Accounting Act.

The provision of data is mandatory based on the relevant legislation. If you fail to do so, the invoice will not be accepted.

Invoice data is stored electronically with the help of the service of the National Tax and Customs Authority.

- Partner: NAV, Online Invoicing
- Privacy Info: <https://nav.gov.hu/ugyfeligiranytu/nav-online>

We will hand over the necessary account data to our partner entrusted with keeping our accounting.

- Partner: Mázi Hedvig Angéla
- Contact: +3630 531 0003

5.5 Use of our website (cookie management)

Data subjects: all interested parties who access the website

Purpose of data processing: To continuously ensure the proper functioning of the website and to increase the user experience.

The <https://www.indebud.hu/> website currently uses the following cookie:

- a.) Cookies that are essential for the operation of the site, do not require consent

Name / Key	Domain domain	Data processing time	Short description
PHPSESS	.indebud.hu	continuous	A cookie generated by applications based on the PHP language. This is a general-purpose identifier that is used to maintain user session variables. It's usually a randomly generated number that can be site-dependent, but a good example is maintaining a user's logged in

			status across pages.
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b.) Performance cookie, consent required, acceptance optional

Name / Key	Domain / Tartomány	Data processing time	Short description
_ga_H4FFW3T24Z	.indebud.hu	1 year and 1 month	This cookie is used by Google Analytics to maintain session status.
_ga	.indebud.hu	1 year and 1 month	This cookie name is associated with Google Universal Analytics – a major update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a customer ID. This cookie is included in each page request on a website and is used to calculate visitor, session and campaign data for website analytics reports.

The process of data processing:

Brief description of the use of cookies: when [you browse the https://www.indebud.hu/](https://www.indebud.hu/) site, the website may store a short text file (hereinafter referred to as a cookie) on the device you are using, which is harmless to the device, but makes browsing on the site easier. Cookies can be of various types, some of them are essential for the operation of the website, their purpose is to ensure the smooth operation of the site and to improve the user experience. The purpose of statistical cookies related to Google Analytics is to provide useful feedback on how our users use the site, what are the possible points that need improvement, what are the most visited pages, what devices our visitors use to browse the site.

If you as a user do not want to receive cookies, you can disable the use of cookies in your browser and delete cookies related to the site.

6. Transmission and transfer of data

Occasionally, we transfer personal data to third parties in connection with our activities. The data may be transmitted electronically, ensuring that the data is only accessible to the recipient.

- Our bank partner: UniCredit Bank Zrt.
- Data processing information: https://www.unicreditbank.hu/hu/rolunk/hasznos_informaciok/penzugyi_informaciok/tajekoztat_o_az_adatkezelesrol.html

7. Data security

We ensure the security of the personal data we process through technical and organizational measures and the establishment of procedures.

Personal data is only accessible to those of our employees who need to know it in order to perform their duties.

To keep your data safe:

- During the design and operation of the IT system, we assess and take into account the potential risks, striving to reduce them continuously
- monitor emerging threats and vulnerabilities (such as computer viruses, computer break-ins, denial-of-service attacks, etc.) so that we can take timely action to avoid and eliminate them
- By monitoring our IT system, we ensure the detection of possible problems and events

8. Pursuant to Articles 15 to 20 of the GDPR, data subjects have the following rights in relation to their personal data:

- Right to information
- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object

You can exercise your rights by sending an inquiry to budai227@gmail.com e-mail address.

On the basis of the right of access, you may request information on whether your personal data is being processed, and if such data processing is in progress, you may have access to the personal data and may also receive information about the security conditions of data processing.

In accordance with the right to rectification, we will rectify your inaccurate personal data without delay upon request, as well as complete your incomplete data.

On the basis of the right to erasure, we will delete your personal data without undue delay in the following cases:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- if the consent on which the data processing is based is withdrawn and there is no other legal basis for the processing of the data
- if we have processed the personal data unlawfully
- We are required by law to delete personal data

Personal data cannot be erased if the processing is necessary for the establishment, exercise or defence of legal claims.

Upon request, we restrict the use of personal data **on the basis of the right to restriction of processing**, in which case we will only use personal data to a certain extent.

On the basis of the right to data portability, provided that it does not infringe on the rights and freedoms of others, your data will be sent to you in a structured, commonly used and machine-readable format or, **upon request, transmitted directly to another data controller.**

Right to information: The Data Subject may request information from us about the processing of his or her personal data within the period of data processing. Within the shortest possible time from the submission of the request, but no later than within 30 days, we shall provide the Data Subject with information in writing, in an easily understandable form, about the processed data, the purpose, legal basis, duration of data processing, and – if the data has been forwarded – about who receives or has received the data and for what purpose.

Right to object: We will examine the objection within the shortest possible time from the submission of the application, but no later than within 15 days, we will make a decision on the question of its justification, and we will provide written information about the decision. If we are unable to comply with the data subject's request for rectification, blocking or deletion, we will communicate the factual and legal reasons for rejecting the request for rectification, blocking or deletion in writing or electronically with the consent of the data subject within 30 days of receipt of the request.

9. Other provisions on data processing

Termination of data processing

We will delete all personal data that

- in the case of the processing of which the purpose of data processing has ceased to exist, or
- for the processing of which the consent of the data subject is not available,
- the data subject has withdrawn the right to process the data or has prohibited the processing, or

- for the management of which there is no legal basis.

Instead of deleting it, we block personal data if the data subject requests it or if, based on the information available to us, it can be assumed that deletion would harm the legitimate interests of the data subject. The personal data blocked in this way will only be processed for as long as the purpose of data processing that excluded the deletion of the personal data exists.

10. Our Rules of Procedure for Handling Privacy Complaints

The procedure: we treat and address all comments submitted to us in writing by the natural persons concerned as complaints if they formulate a violation in connection with our procedure or omission in the field of data protection that is incompatible with the provisions of this Privacy Policy (hereinafter: **complaint**).

Complaints can be made by sending a report to our e-mail address above (electronically) or to your mailing address.

The complaint must contain at least: the complainant's name, address (e-mail address), telephone number, the date of the injury, the specific description of the complaint, the complainant's signature, and that the complainant consents to the processing of the data contained in the complaint in the procedure related to the complaint at the same time as signing the complaint. In the absence of these data and a statement, we will not investigate the complaint and notify the Complainant thereof in writing.

We process the Complainant's data exclusively in connection with the reporting of complaints, we do not disclose them to third parties, except for official or court requests specified by law, and we do not use them for business purposes.

We investigate the complaint and provide a reasoned, written response within 30 days of receipt in the same way as the method of reporting the complaint (by e-mail or post). If the 30-day deadline is not sufficient to investigate the complaint, we will inform the complainant about this. In this case, we will provide a written, reasoned response within 3 months of the notification, in the same way as the notification.

If, after examining the complaint, we establish that the complainant's complaint was factual and justified, we will inform the Complainant of the method and extent of the remedy of the grievance at the same time as the complaint is assessed.

In the event of rejection of the complaint, we will inform you in writing that the Complainant may turn to the National Authority for Data Protection and Freedom of Information (hereinafter referred to as the National Authority for Data Protection and Freedom of Information) or, in the event of a violation, to the Court of Justice.

The NAIH facilitates the enforcement of data subjects' rights by issuing formal letters: <https://naih.hu/panaszuegyintezes-rendje.html>

Complaint: NAIH; 1055 Budapest, Falk Miksa u. 9-11,
E-mail address: ugyfelszolgalat@naih.hu
Phone number.: +36(1) 391 1400
Website: www.naih.hu

11. Data breach and management

Personal data breach: any activity, intervention or omission that enables the unlawful processing or processing of personal data, in particular unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as accidental destruction or damage.

If you notice anything like this in connection with our activities, please report it as soon as possible by e-mail to the budai227@gmail.com address.

As a data controller, we record the report and immediately start investigating it. If the data breach occurred in connection with the IT system, we will also inform the service providers responsible for the operation of the databases concerned.

In order to investigate the report and address the incident, we will gather any information that may be necessary to identify it, reduce potential damage, and take further action to remediate. We fix it as much as possible

- the time and place of the incident,
- the description, circumstances and effects of the incident,
- the scope and number of data compromised during the incident,
- the scope of persons affected by compromised data

In addition, in accordance with the legal requirements, we will report to the Authority (NAIH) within 72 hours.

Data Protection Officer: As a data controller, we do not process large amounts of personal data related to our main activity and/or can be classified as particularly sensitive, therefore we do not consider the appointment or employment of a data protection officer to be justified, nor are we obliged to do so by the effective legal regulations.

Note: As a data controller, we reserve the right to continuously update this Privacy Policy, and in the course of doing so, to unilaterally modify the information detailed in it, also following the changes in the law. The current information is available on our website.

Kecskéd, January 2026

Budai Zsolt Ev.