



**Avalon Park Kft.**

**Angel Petrol**  
**[angelstation.hu](http://angelstation.hu)**

# **DATA MANAGEMENT INFORMATION**

**25th May 2018**



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## 1. INTRODUCTION

Avalon Park Kft. (1075 Budapest, Károly körút 1. 1. em. 2., hereinafter referred to as service provider or data controller), as the data controller, agrees to be bound by the contents of the legal announcement detailed hereunder. It undertakes to ensure all data processing in connection with its activity complies with the requirements determined in the present regulation and the relevant legal regulations in force.

The data privacy directives that may emerge in connection with the data processed by Avalon Park Kft. in the course of operating the Angel Petrol fillings station are continuously available at <http://angelstation.hu/angel-petrol/adatvedelem>.

Avalon Park Kft. reserves the right to amend the present announcement at any time. Naturally, prior notification of such amendments will be sent in time.

Should you have any questions in connection to the present announcement, please write to us and our colleagues will be more than happy to respond.

Avalon Park Kft. is committed to the protection of the personal data of its clients and partners, and considers respecting its clients' right to informational self-determination to be of paramount importance. Avalon Park Kft. manages personal data as confidential information and will take all security, technical and organisational measures to guarantee the security of the data.

The following details the data processing practice of Avalon Park Kft.

## 2. SCOPE OF PERSONAL DATA, THE OBJECTIVE, LEGAL BASIS AND DURATION OF DATA PROCESSING

In the following Avalon Park Kft. shall describe its data processing principles, introducing the expectations it has laid down for itself and adheres to, as the data controller.

Its basic data processing principles are in coherence with the effective legal regulations concerning data privacy, especially 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, GDPR);
- ✓ Act CXII of 2011 on informational self-determination and freedom of information (Info Act);
- ✓ Act V of 2013 on the Civil Code;
- ✓ Act CVIII of 2001 on certain issues of electronic commerce services and information society services (E-comm Act);
- ✓ Act C of 2003 on electronic communications;
- ✓ Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (CommAdv Act);

# **ANGEL PETROL LOYALTY PROGRAM**

## **2.1. ANGEL PETROL LOYALTY PROGRAM**

The Angel Petrol Loyalty Program (Program) can be joined in the way and under the conditions set forth in the *Code of Conduct of the Angel Petrol Loyalty Program* available at the Angel Station filling station and shop at Hrsz. 026/12., H-3800 Szikszó, and also at [angelstation.hu/husegprogram](http://angelstation.hu/husegprogram).

The Farmers' Discount Card available for agricultural entrepreneurs joining the Angel Petrol Loyalty Program is not suitable for collecting points; it only certifies eligibility for discounts.

Natural persons residing in the following villages and joining the Angel Petrol Loyalty Program can take advantage of further benefits using their Loyalty Card:

Szikszó, Abaújlak, Abaújszolnok, Alsóvadász, Aszaló, Felsővadász, Gadna, Gagybátor, Gagyvendéji, Halmaj, Hernádkércs, Homrogd, Kázsmárk, Kiskinizs, Kupa, Léh, Monaj, Nagykinizs, Nyésta, Rásonysápberencs, Selyeb, Szentistvánbaksa, Csobád, Detek, Baktakék, Beret.

Eligibility for discounts can be proven on registration by presenting a valid address card.

The electronic form of the magnetic card of the Angel Petrol Loyalty Program indicates only the card number.

*The objective of data processing:* participation in the Angel Petrol Loyalty Program; collecting, redeeming and monitoring customer points, checking of customer points by the user; providing individual birthday discounts; analysing customer behaviour; selling statistics that cannot be used for personal identification; documenting legal statements made by participants; maintaining contact.



*Legal basis of data processing:* data processing is necessary for the performance of contracts [Point b) of Section 6 (1) of the GDPR].

*Type of personal data processed:* ID number, card number, name, sex, data of birth, correspondence address, phone number, e-mail address, data about collecting and redeeming points (date and time, article number of the goods purchased, description, quantity, price, method of payment, changes in points and balance).

*Duration of data processing:*

- ✓ two years after last use of the card,
- ✓ regarding purchases when points are redeemed, 8 years in according to Section 169 (2) of the Act on Accounting.

*Possible consequences of failure to supply data:* the person concerned may not take part in the Angel Petrol Loyalty Program.

*Modification and deletion of data:*

The modification of data can be requested at the contacts indicated in Chapter 4 of this Information booklet.



## ***DIRECT BUSINESS ACQUISITION***

### **2.2. ANGEL PETROL NEWSLETTER**

People giving permission on the registration sheet for sending newsletters register to the Angel Petrol newsletter.

*The objective of data processing:* sending e-mail-based newsletters containing commercial advertisements to those interested, providing information on current news and special offers, sending direct marketing inquiries, maintaining contact, forwarding the data manager's own and its partners' business offers.

*Legal basis of data processing:* consent of the person concerned, Section 13/A of the of E-comm Act, Section 6 (5) of the CommAdv Act.

*Type of personal data processed:* identification number, date, time, e-mail address, name, consent to sending direct marketing materials, signature in the case of paper-based sign-up.

*Duration of data processing:*

- ✓ 24 hours in the case of newsletter sign-ups without user confirmation, otherwise
- ✓ until cancellation of the consent by the user but no later than
- ✓ 24 months from the last time the user opened a newsletter or the date of data updating, whichever is sooner,
- ✓ three months in the case of addressees of undelivered newsletters.

*Possible consequences of failure to supply data:* the person concerned will not receive offers sent by the data manager or its partners.

*The cancellation of consents given to sending direct marketing messages and the deletion or modification of personal data can be requested at the following contacts:*

- ✓ by e-mail: [leiratkozas@avalonpark.hu](mailto:leiratkozas@avalonpark.hu) or
- ✓ by post: Avalon Park Kft. 1075 Budapest, Károly körút 1. 1. em. 2.

## *Data controllers:*

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### **Name**

Light Media Bt.





## **ANGELSTATION.HU WEBSITE**

### **2.3. THE LOG OF THE ANGELSTATION.HU SERVER**

When the website [angelstation.hu](http://angelstation.hu) is visited, the web server automatically logs user activities.

*The objective of data processing:* during the visit of the website, the service provider records user data for checking if its services work properly, making user searches more precise, relevant and supplemented, custom-tailored service and preventing data breach or unauthorized use.

*Legal basis of data processing:* the data controller has a legitimate interest in identifying users and preventing data breach [Point f) of Section 6 (1) of GDPR and Section 13/A (3) of the E-comm Act].

*Type of personal data processed:* identification number, date and time of visit, the URL address of the site visited, the IP number of the user's computer<sup>1</sup>, type of the user's operating system and web browser.

*Duration of data processing:*

✓ ten days.

*Data processing of third party service providers in connection with data logging:*

<sup>1</sup> IP address: a series of numbers which makes the clear identification of the devices of the users connecting to the network possible

The html code of the portal is independent of Avalon Park Kft. and contains references to third party servers. The server of the third party is in direct connection with the user's computer. We would like to call our visitors' attention that the providers of such references are suitable for collecting user data due to the direct connection to their servers and the direct communication with the user's web browser (e.g. IP address, data of the browser and the operating system, the address of the site visited and the time of visit).

Any content that might be tailored to users is provided by the server of the third party service provider.

Data processing conducted for web auditing purposes and implemented by recording website visitors' data by web servers is a common form of data processing on the internet, therefore the user agrees to them by using the internet and visiting websites.

The data controllers listed below are able to provide detailed information on data processing performed by the servers of third party service providers.

<b>Name</b>	<b>Registered office</b>	<b>Data processing task</b>
Tárhely.EU Kft.	1144 Budapest, Ormánság u. 4.	providing online storage space

The third party service providers available at the following contacts, for the sake of providing their services, may place small data packages (cookies) on the user's computer, record the IP address of the user's computers and other user data as well as display advertising materials for them:

<b>Purpose</b>	
analytical measurements	C
display of maps	C
access to social media platforms	F
access to social media platforms	T
access to social media	C



## 2.4 CORRESPONDENCE WITH AVALON PARK KFT.

## CONTACT

If you wish to contact us, you can contact the data controller at the contacts available in this information booklet or under the 'Contacts' menu option of the website [angelstation.hu](http://angelstation.hu).

Avalon Park Kft. deletes all incoming e-mails, along with the name and e-mail address of the sender, date and time data and any other personal data given in the message, not later than five years from the communication of such data.



## ***OTHER FORMS OF DATA PROCESSING***

Information on data processing not listed herein will be given upon collection of the data.

We hereby inform our clients that courts of justice, prosecutors, investigating authorities, the authority dealing with administrative offences, the public administration authority, the Hungarian National Authority for Data Protection and Freedom of Information and, based on the relevant legal regulation, any other organisation may request the data controller to provide information, communicate or disclose data and hand over documents.

Avalon Park Kft. shall only disclose personal data to authorities if the authority in question has clearly indicated the precise objective and the scope of data, and only to the volume and extent that is indispensable for the implementation of the aim of the inquiry.

### 3. THE METHOD OF STORING PERSONAL DATA AND THE SECURITY OF DATA PROCESSING

Avalon Park Kft. and its data processors shall take technical and organising action, taking into account the state of technology and the costs of implementation, and the nature, circumstances and objectives of data processing and the risks of variable probability and severity the rights and freedoms of natural persons are exposed as a result, in order to guarantee the data security corresponding to the level of risk.

Avalon Park Kft. shall select and operate any IT tool for processing personal data in the course of providing the service, so the data processed:

- a) shall remain accessible to those authorised (availability);
- b) are valid and their authentication is ensured (authenticity of data processing);
- c) are unchanged and this can be verified (data integrity);
- d) are protected against unauthorised access (data security).

Avalon Park Kft protects the data with appropriate measures, especially against unauthorised access, amendment, transfer, disclosure, deletion or destruction, including inadvertent destruction, damage and becoming inaccessible due to change of the applied technology.

Avalon Park Kft., in order to protect the electronically processed data files in its records shall, ensure, with the help of an appropriate technical solution that the stored data – unless allowed by law – should not be possible to directly to be connected and linked to the person concerned.

Given the current state of advancement of technology, Avalon Park Kft. will ensure security of data processing by technical, organisational and institutional measures, providing the level of security matching the risks emerging in relation to data processing.

Avalon Park Kft. shall keep the following in the course of data processing

- a) confidentiality: protecting the information, allowing access to only those authorised;
- b) integrity: protects the information and the accuracy and completeness of processing;
- c) availability: ensures access to the desired information when the authorised user needs it, along with the availability of the related devices.

The IT system and network of Avalon Park Kft. and its partners are protected against computer assisted fraud, espionage, sabotage, vandalism, fire and flood and computer viruses, computer burglary and attacks leading to refusal of service. The operator ensures security through server level and application level protective measures.

We wish to notify the users that electronic messages forwarded on the internet are vulnerable, regardless of protocol (e-mail, web, FTB, etc.) against network threats that may lead to improper activity, dispute of contract or disclosure and modification of the information. To ensure protection against such threats, the data manager shall take all reasonable expected precautions. It monitors the systems in order to record all security deviations and provide evidence for all security events. The system monitoring allows, in addition, checking the efficiency of the applied precautions as well.

Avalon Park Kft., as data controller, shall record the occasional data protection incidents, indicating the facts related to them, their effects and the remedial measures taken.

Avalon Park Kft. shall, report occasional data protection incidents without delay, and if possible, within 72 hours from the data protection incident coming to its knowledge to the Hungarian National Authority for Data Protection and Freedom of Information, except if the said data protection incident is unlikely to be risky for the rights and freedoms of natural persons.

## 4. DATA AND CONTACT DETAILS OF THE DATA CONTROLLER

Name: Avalon Park Kft.

Registered office: 1075 Budapest, Károly körút 1. 1. em. 2.

Company registration number: 01-09-986876

Name of the court of registration: Metropolitan Court of Registration

Tax number: 23966066-2-42

Phone number: 06.46.887.877

E-mail: [angelpetrol@angelpetrol.hu](mailto:angelpetrol@angelpetrol.hu), [angelstation@angelstation.hu](mailto:angelstation@angelstation.hu)

## 5. LEGAL REMEDY

The person concerned may request information on the processing of his/her personal data, and request their correction, and – with the exception of mandatory data processing – their deletion, withdrawal, limitation of data processing and may exercise his/her right to carry data and object in the manner indicated upon recording the data, at the above contacts of the data controller, and through its customer service.

### The right to information:

Upon request by the person concerned, Avalon Park Kft. shall take appropriate action to provide all information referred to in Articles 13 and 14 of the GDPR and those according to Articles 15-22 and 34 concerning the processing of personal data in clear, understandable, concise and easily accessible form to the persons concerned.

### The right of the person concerned to access:

The person concerned is entitled to receive feedback from the data controller on whether the processing of the personal data of the said person is underway, and is entitled to gain access to the personal data and the following information: the objective of data processing; the categories of the personal data of the said person, the addressees or categories of addressees to whom the personal data have been or will be communicated, including especially addressees in third countries and those of international organisations; the planned duration of storing the personal data; the right of correction, deletion or limitation of data processing and the right to object; the right to submit complaints to the supervisory authority; the information on data sources, the fact of automated decision making, including profiling and clear information on the applied logic, the significance of the data processing in question and the consequences it may hold for the party in question. In case of personal data transferred to third countries or to international organisations, the person concerned is entitled to be informed of the guarantees corresponding to the said data transfer.

Avalon Park Kft. shall provide the copy of the personal data subject to data processing to the person concerned. For further copies requested by the person concerned, the data controller may charge a reasonable amount of administrative fee. Upon request by the person concerned, Avalon Park Kft. shall provide the said information in electronic form.

The right to information may be exercised via the contacts described in the Introduction and point 4. Upon request by the person concerned – following identification and providing authentic proof of his/her identity – information may also be given verbally.

Right to amendment:

The person concerned may request amendment of any erroneous personal data processed by Avalon Park Kft. as well as supplementation of deficient information.

The right to deletion:

In case of any of the reasons listed below, the person concerned may request Avalon Park Kft. to delete the personal data corresponding to him/her without delay:

- a) the personal data are no longer needed for the purpose they were collected or processed in any other way;
- b) the person concerned revokes his/her consent that formed the basis for the data processing and the data processing has no further legal basis;
- c) the person concerned objects against the data processing and there are no legal reasons for that data processing having priority;
- d) the personal data have been processed illicitly;
- e) the personal data must be deleted in order to carry out legal obligations according to the EU or member state law applicable to the data controller;
- f) the collection of the personal data took place in connection with offering services related to the information community.

Deletion of data may not be initiated if the data processing is necessary: for exercising the right to information and freedom of expression; in order to fulfil obligations of the data controller according to EU or member state law specifying the processing of personal data, or for duties by the data manager exercised through assignment of public power or by public interest; for objectives concerning public health or for purposes of archiving, scientific or historic research or statistics, out of public interest; or to propose, enforce or protect legal requests.

Right to limiting data processing:

Upon request by the person concerned, Avalon Park Kft. will limit data processing if any of the conditions listed below is met:

- a) the person concerned disputes the accuracy of the personal data, in which case the limitation applies to the period that allows checking the accuracy of personal data;
- b) the data processing is illicit, and the person concerned objects to deleting the data and requests limitation of their use instead;
- c) the data controller no longer needs the personal data for data processing, but the person concerned needs them to propose, validate or protect legal requests; or
- d) the person concerned objected against data processing; in this case, the limitation applied to the period until it is established that the justified reasons of the data controller enjoy priority over the justified reasons of the person concerned.

If the data processing is subject to limitation, with the exception of data storage, the personal data may only be processed with the consent of the person concerned, for purposes of proposing, enforcing or protecting legal requests, or to protect the rights of other natural persons or legal entities, or out of public interest of the European Union or an EU member state.

Avalon Park Kft. shall inform the person concerned in advance on the release of the limitation of data processing.

*The right to carrying data:*

The person concerned is entitled to receive the personal data concerning him/her, provide by him/her to the data controller in an articulate, widely used, machine-legible format, and to transfer these to another data controller.

*The right to objection:*

The person concerned is entitled to object at any time, for reasons in connection with his/her situation, against the processing of his/her data for duties by the data controller exercised through assignment of public power, or for the enforcement of the rightful interests of a third party by the data controller, including profiling based on the aforementioned regulations.

In case of objection, the data controller may no longer manage the data in question, except if enforced by justified legal reasons having priority over the interests, rights and freedoms of the person concerned, or which are connected to the proposal, enforcement or protection of certain rights.

If the processing of personal data is conducted for purposes of direct business gain, the person concerned is entitled to object at any time against management of personal data in connection with his/her person for this purpose, including profiling, if this latter is connected to the said direct business gain.

In case of objection against managing the personal data for direct business gain, Avalon Park Kft. shall not process such data.

*Automated decision making in individual cases, including profiling*

The person concerned is entitled to avoid that the scope of a decision exclusively based on automated data processing be extended to him/her – including profiling – that would entail legal consequences or other likewise significant effects.

The above entitlement is not applicable if

- a) it is necessary for the establishment or performance of the contract between the person concerned;
- b) its enforcement is allowed by EU or member state law applicable to the data controller that also establishes appropriate provisions ensuring the protection of the rights, freedoms and lawful interests of the person concerned; or
- c) it is based on the express consent of the person concerned.



*The right to revocation*

The person concerned is entitled to revoke his/her consent anytime. The revocation of the consent does not affect the legality of the consent-based data processing prior to revocation.

*Procedural rules*

The data controller shall, without undue delay, but latest within one month from the arrival of the request, inform the person concerned on the decisions made based on the request according to articles 15–22 of the GDPR. If necessary, considering the complexity of the request and the number of requests, this deadline may be extended by a further two months.

The data controller shall inform the person concerned by indicating the reasons of delay within one month from reception of the request. If the person concerned submitted the request by electronic means, the information will also be given in electronic form, unless requested otherwise by the person concerned.

If the data controller should fail to take action following the request of the person concerned without delay, but not later than one month from the reception of the request, it shall notify the said person of the reasons of the delay and that the said person is entitled to lodge a complaint at a supervisory authority and legal remedy at a court of justice.

Avalon Park Kft. provides the requested information free of charge. If the request of the person concerned is unambiguously unfounded, or – especially due to its repetitious nature – excessive, the data controller, considering the administrative costs of providing the requested information or action, may charge a fee, or refuse to take action based on the said request.

The data controller shall inform all addressees of the amendments, deletions or limitations of data processing it effected, the person or legal entity the personal data have been communicated to, unless this proves impossible or would require unreasonable effort. The person concerned will be informed of these addressees by the data controller.

The data controller shall provide the copy of the personal data subject to data processing to the person concerned. For further copies requested by the person concerned, the data controller may charge a reasonable amount of administrative fee. If the person concerned submitted the request by electronic means, the information will also be given in electronic form, unless requested otherwise by the person concerned.

*Indemnification and compensation for emotional distress/damage to reputation;*

All persons subjected to property damage or non-pecuniary damage as a result of breach of the data protection decree, are entitled to indemnification by the data controller or the data processor. The data processor is only responsible for the damages caused by the data processing, if the data controller did not adhere to its obligations specifically defined for data controllers by legal regulations, or if it ignored the legal instructions of the data controller or acted in contradiction to such.

If several data controllers or data processors, or both the data controller and the data processor are involved in the same data processing, and are responsible for the damages caused by data processing, then all data controllers or data processors are jointly and severally liable for the total damage caused.

The data controller and the data processor will not be liable if they are able to prove that they are in no way responsible for the event that resulted in the aforementioned damage.

*Complaint at the data privacy auditor:*

If you experience any problems regarding the data processing conducted by Avalon Park Kft., kindly contact our data privacy auditor: [www.ppos.hu/audit](http://www.ppos.hu/audit)



The right to turn to court:

In case of violation of the rights of the person concerned, the person concerned may turn to court (according to the registered office of the respondent or the address of residence of the person concerned, based on the choice of the person concerned). The court of justice adjudicates the case out of turn. A lawsuit initiated in connection with the protection of personal data is exempt from duties.

Official data protection procedure:

Complaints may be lodged at the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Hungarian National Authority for Data Protection and Freedom of Information

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing Address: 1530 Budapest, Pf.: 5.

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Data Protection - <http://www.ppos.hu>

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