

DATA PROCESSING POLICY

Online ordering

Name and contact details of the Data Controllers and of the Data Controllers' representative

- GYORSPÉNZVÁLTÓ Pénzügyi Korlátolt Felelősségű Társaság,
- Interchange Pénzügyi Szolgáltató Korlátolt Felelősségű Társaság,
- Magyar Pénzváltó Kereskedelmi Korlátolt Felelősségű Társaság,

(hereinafter: Controllers, registered seat: 1027 Budapest, Kacska utca 11., represented by: Jánvári Krisztián managing director, tel.: 06 (1) 411 3580, e-mail: privacy@interchange.hu)

The purpose and legal basis of data processing

The purpose of data processing is to keep in contact with you in the course of the currency ordering services.

The legal basis of the data processing is Article 6 (1) of GDPR, according to which you freely give the specific, informed and unambiguous indication of your wish by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you. The consent may be withdrawn at any time, which does not affect the lawfulness of processing based on consent before its withdrawal. The legal basis of the data processing is to comply with a legal obligation, as processing your personal data is necessary to comply with a legal obligation to which the Controllers are subject.

The scope of the data processed

For the purposes indicated above, the Controllers process the following of your personal data:

- first name
- family name
- phone number
- e-mail address

The storage period

The data listed in the previous Paragraph are deleted within 24 hours of receipt of the currency ordered by you or of the expiry of the time limit set for the receipt thereof.

Engaging a Processor

The Controllers, for performing tasks related to data processing, engages Global Travel spol. s.r.o., as Processor. The contact details of the processor: Palackeho 15, 110 00 Praha 1, Czech Republic, telephon: +420 224 948 445, e-mail: gdpr@interchange.cz

The contracting party acts as processor with regard to online currency ordering. His rights and obligations regarding the use of the data are determined by the Controllers. Processor is not entitled to make substantive decisions related to the use of data. He may not use the data for his own purposes. Personal data shall be stored and preserved according to the Controllers' instructions.

The data protection officer

Data protection officer: Pocsai Viktor
Contact details: privacy@interchange.hu

Personal data connected to children and third persons

Under GDPR, children under 16 may not provide personal data on themselves, unless the data has been given or authorized by the holder of parental responsibility over children.

By providing the Controllers with your personal data, you declare that you acted with due regard to the above, and that your capability of giving consent to the use of personal data is not limited.

Provided that you are not entitled to provide the Controllers with your personal data, you are obliged to acquire the consent of the third party concerned (the holder of parental responsibility, e.g. parent, legal representative). While using and providing services the Controllers are not informed whether a third party's consent is required with regard to a data subject, so you shall ensure compliance with the present Paragraph, and the Controllers hold no liability whatsoever therefor.

The Controllers reserve the right to verify whether the proper legal basis and/or the conditions of lawful processing of certain personal data are given. For instance, if you act on behalf of a third party, the Controllers may request your authorization and/or the due data processing consent of the data subject with regard to the specific case.

The rights and remedies of data subjects

Following 25th May 2018 your detailed data protection rights and remedies are provided for by GDPR. Below you find information on your most important rights and remedies under GDPR.

Should you have any remarks or questions with regard to the present Data Processing Policy or to the content hereof, feel free to contact us; the staff of the Controllers will assist you at any of the above access points.

Access or right to information under GDPR

Based on this right you are entitled to receive information from us on whether your personal data are being processed by the Controllers. If such data processing is in progress, you are entitled to receive access to and information on your personal data being processed as well as to the following information:

- the purpose of the data processing,
- the categories of the personal data concerned,
- the addressees or the categories of addressees to whom the personal data were disclosed by Controllers, including in particular third country addressees and international organizations,
- the storage period of the personal data or, if this is not possible, the criteria of determining the storage period,
- you have the further right to request the Controllers to correct, erase or limit the use of the personal data pertaining to you, as well as to protest against the processing of your personal data,
- you have the right to submit a complaint to the supervisory authority,

- provided that the Controllers received the data from a third person, you may request to receive all the available information on the source of the personal data,
- the existence of automated decision-making; provided that the Controllers exercise such data processing of your data, the existence of automated decision making, including profiling, as well as information on the logic involved and on the significance and the envisaged consequences of such processing for you,
- provided that your personal data is transferred to a third country, you are entitled to receive information on adequacy guarantees related to the transfer,
- you may request a copy of the personal data forming the basis of the data processing, which, in the absence of any legal obstacles, will be made available to you. If you submitted your request by electronic means, the information, according to the provisions of GDPR, shall be made available to you in a commonly used electronic form, unless you request it otherwise,
- The Controllers inform the data subject of the measures taken with regard to their request without any undue delay, but at all events within one month of receipt of the request. If necessary, with regard to the number and complexity of the requests, such time limit may be extended for another two months. Within one month of the receipt of the request, the data subject shall be informed by the Controllers of the extension of the time limit also indicating the reasons for the delay. If the data subject submitted the request by electronic means, the information shall preferably be provided by electronic means, unless otherwise indicated by the data subject,
- if, following the request of the data subject, the Controllers take no measures, they shall inform, without any delay but not later than one month of receiving the request, the data subject of the reasons therefor as well as of the fact that the data subject may submit a complaint to certain supervisory authority and may exercise his right to judicial review.

Right to rectification

Under GDPR you are entitled to obtain from the Controllers without undue delay the rectification of inaccurate personal data concerning you. Furthermore, you have the right to have your incomplete personal data completed.

Right to erasure, right to be forgotten

On this legal basis, you are entitled to have all the personal data relating to you erased – without any undue delay as defined by GDPR – if any of the following conditions are met:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- You object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controllers are subject;
- the personal data have been collected in relation to providing services related to the information society.

It is not possible to implement the erasure or to enforce the right to be forgotten if processing is necessary for the following reasons incorporated in GDPR:

- for exercising the right of freedom of expression and information;

- for compliance with a legal obligation which requires the processing of personal data under Union or Member State law;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure or the right to be forgotten is likely to render impossible or seriously impair such data processing; or
- for the establishment, exercise or defence of legal claims.

We make all reasonable effort to have all information, which has been provided for us unlawfully, erased and we assure you that such information is not forwarded to third parties and that it is not utilized by us (either for marketing or for other purposes). Please inform us without delay if you experience that unauthorized information has been disclosed by a child about themselves or by a third party about you. You may contact us at the above access points.

Right to the restriction of processing

Under GDPR you have the right to request for the restriction of processing if one of the following applies:

- you contest the accuracy of the personal data; in such cases the restriction applies for a period which enables us to verify the accuracy of the personal data which you find inaccurate,
- the processing is unlawful but you oppose to erasure of the data and request the restriction of their use instead,
- the Controllers no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- you have objected to processing, in which case processing is restricted pending the verification of whether the legitimate grounds of the Controllers override yours.

Where processing has been restricted under the previous paragraph, such personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. Controllers shall inform you in advance of the restriction of processing being lifted.

Notification obligation regarding rectification or erasure of personal data or restriction of processing

Controllers shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. If you request it, we will inform you about such recipients.

Right to data portability

Under GDPR, you are entitled to receive the personal data concerning you, which you have provided to Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without any hindrance from Controllers.

You may exercise the right to data portability in cases when:

- the processing is based on consent or on a contract and
 - the processing is carried out by automated means.

In exercising the right to data portability you are entitled to request that the personal data be directly transmitted – where technically feasible – from the Controllers to another controller indicated by you.

Right to object

Under GDPR, you are entitled to object, on grounds related to your particular situation, at any time to processing of personal data concerning you which is based on a lawful interest, including profiling. Controllers shall no longer process the personal data unless Controllers demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you are entitled to object at any time to the processing of personal data concerning you for such purposes, which includes profiling, to the extent that it is related to such direct marketing.

If you object to the processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

Where personal data are processed for scientific or historical research purposes or statistical purposes, you, on grounds relating to your particular situation, have the right to object to the processing of personal data concerning you, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

The right to submit complaints to the Supervisory Authority

You are entitled to lodge a complaint with the supervisory authority – in particular in the Member State of your habitual residence, workplace or of the alleged infringement if you consider that the processing of personal data relating to you infringes the provisions of GDPR.

The competent supervisor authority in Hungary is Nemzeti Adatvédelmi és Információszabadság Hatóság (<http://naih.hu/>; 1363 Budapest, Pf.: 9.; tel.: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

You are entitled to effective judicial remedy against a legally binding decision of the supervisory authority concerning you.

You are entitled to effective judicial remedy if the competent supervisory authority does not handle the complaint or does not inform you within three months of the progress or outcome of the complaint lodged.

Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.