

e-mesekozmetika.hu

BEAUTY SALON

Data Processing Information

DATA PROCESSING INFORMATION

1. GENERAL PROVISIONS

1.1 Purpose and scope of this information.

The service provider as data controller (hereinafter referred to as: service provider, data controller) on the basis of the legal provisions in force concerning the processing of personal data, shall inform the visitors of the website and the users of the cosmetic, aesthetic services it provides, (hereinafter referred to as the "Data Subject") about the data processing carried out by the service provider.

The data controller is committed to protecting the personal data of its clients and partners. The data controller treats data confidentially and takes all security, technical and organizational measures to ensure data security. Please read this data processing information carefully.

If you have any questions, remarks about the data processing information or the processing of personal data, please contact the data controller.

1.2 Data of the Data Controller

Data Controller: Emese Andirkóné Soós, sole proprietor

Registered office: 4225, Debrecen 10, Gönczy Pál Street

Address: 4225, Debrecen 10, Gönczy Pál Street

Email: asekozmetika@gmail.com

Website: www.e-mesekozmetika.hu

Telephone: +36 30 2756 307

Data Protection Officer: not employed by the organization

1.3 Concepts

The terms used in this Data Processing Information are defined in accordance with the GDPR and the interpretation clause of the Act on Informational Self-determination and Freedom of Information.

- **personal data:** any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified who, directly or indirectly, in particular by an identifier such as a name, number, location data, online identifier or identifiable on the basis of one or more factors relating to his physical, physiological, genetic, mental, economic, cultural or social identity;

- **consent:** voluntary, specific, informed and unambiguous expression of the data subject's wishes by which the data subject indicates, by a statement or by an act expressing his or her consent in an unequivocal and unambiguous manner, that he gives his consent to the processing of personal data concerning him or her;

- **data controller:** the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or jointly with others; if the purposes and means of data processing are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be determined by EU or member state law;

- **processing:** any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, systematization, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or by making accessible in any other way, coordination or connection, restriction, deletion or destruction;

- **data processor:** the natural or legal person, public authority, agency or any other body

that processes personal data on behalf of the data controller;

- **recipient:** The natural or legal person to whom the personal data is communicated.
- **data concerning health:** Personal data relating to the physical or mental health of a natural person.
- **special data:** Health data are classified as special data according to Article 9 (1) GDPR.
- **medical confidentiality:** Health and personal identification data that became known to the data controller during the treatment, as well as other data learned in connection with the treatment. In order to protect medical confidentiality, the service provider's employees undertake to maintain medical confidentiality.
- **personal data breach:** a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise handled;

1.4 Principles

When processing personal data, the data controller takes into account the basic principles listed by the GDPR. During data processing and data processing operations, the following data protection principles apply:

- Purpose limitation principle: Personal data may only be collected and processed for specified, explicit and legitimate purposes.
- Principle of Lawfulness, fairness and transparency: A processing of personal data must be carried out legally and fairly, as well as in a transparent manner for the data subject.
- Principle of Accuracy: Personal data must be accurate and up-to-date.
- Principle of Storage limitation: Personal data shall only be stored in a form that allows the identification of the data subjects only for no longer than is necessary for the purposes for which the personal data are processed.
- Principle of Data minimisation: Personal data must be adequate and relevant for the purposes of data processing, and must be limited to what is necessary. Personal data can be processed to the extent and for the time necessary to achieve the goal.
- Integrity and confidentiality: Adequate technical or organizational measures must be applied when processing personal data in order to ensure adequate security of personal data.
- Accountability principle: The data controller is responsible for compliance with the data processing principles, and must be able to prove this compliance.

1.5 Applicable legislation

The service provider shall take into account, in particular, the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as "GDPR"), Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information of Hungary (hereinafter referred to as the "Info Law").

2. RIGHTS OF THE DATA SUBJECT

The data subject may at any time request information about the processing of his or her personal data and may also request rectification, specification, erasure or restriction of his/her personal data and exercise any right to which he or she is legally entitled.

Under the provisions of the GDPR, the data subject may exercise the following rights:

- the right of access: The data subject may request information about the processing of his or her personal data.
- the right to rectification: the data subject has the right to obtain from the controller, without undue delay, the rectification of personal data relating to him or her.
- the right to erasure: The data subject shall have the right to obtain, at his or her request and without undue delay, the erasure of personal data relating to him or her.

- the right to restrict processing: In specific cases, at the request of the data subject, the controller restricts the processing of his or her personal data.
- the right to data portability: The data subject may receive or request the personal data provided to the data controller in a segmented, widely used, machine-readable format, or may request that it be provided to another controller.
- the right to object: The data subject may object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data.

The controller shall examine the request as soon as possible after its submission, but no later than 1 month after receipt of the request, and shall inform the applicant in writing based on the request. In the event that the data subject disagrees with the controller's decision or if the controller fails to comply with the above time limit, the data subject may submit a complaint to the supervisory authority and to a court.

3. DESCRIPTION OF DATA PROCESSING

The guests use the services of the beauty salon voluntarily (hereinafter: service) and purchase the products distributed by the service provider.

The controller uses personal data to perform the services it provides, in particular: contacting, logging in, providing the data subject's treatment documentation, billing.

The data controller will not hand over all or part of the personal data it has acquired to a third party, either free of charge or for a fee, without prior information to the data subject. In certain cases - in the event of an official court or police request, legal procedure, or in the event of a violation of the law or a reasonable suspicion of such - the processing and forwarding of a range of the provided data may be made mandatory by law.

Data subjects may only provide their own personal data. If another person's personal data is provided, the data provider must obtain the data subject's consent.

If the person concerned has not yet reached the age of 16, the consent of the person exercising parental supervision is required to manage the personal data of the person concerned. Compliance with legal regulations is the responsibility of the person concerned and the person exercising parental supervision.

The user can view the service provider's website without entering his or her personal data. The data controller makes information about its services and its data processing information available on the website and at its registered office.

3.1 Contacting, maintaining contact

The data subject can contact the service provider by email, by filling in a contact form on the website or by phone.

Purpose of processing: Identification of the data subject, maintaining contact with the data subject.

The information provided on the contact form is required for appointment and contact purposes.

Telephone conversations are not recorded.

Data processed: Name, e-mail address, telephone number, other data provided by the data subject.

Legal basis for processing: the data subject's consent in accordance with Article 6(1)(a) of the GDPR

Data Subjects: Persons who contact the service provider by email, telephone or via the website.

Duration of processing: Until the purpose is achieved, up to a maximum of one year from the date of the request. Afterwards login emails and website applications will be deleted.

Data storage method: electronic

Data processor: website operator, email server

3.2 Cosmetic treatments

The service provider provides cosmetic treatments for natural persons (guests). The products sold by the provider can be purchased in person during the treatments, and can be mailed on request. A service contract is created between the service provider and the guest for the use of the services. For the purpose of concluding the contract it is essential to process the personal data of the guest.

Effective and safe cosmetic treatment requires the processing of the data of the data subject, and of this data processing he or she will be informed in detail on the spot.

Guests must be informed of the provider's privacy policy before the service is provided. The provision of the information is confirmed by the guest's signature. The signed information sheet will be filed with the guest's documentation.

It is determined by the beautician taking into account the nature of the treatment, that for the performance of his/her professional activities to the extent necessary, which data need to be recorded. The guest register must be kept in such a way as to reflect the reality of the treatment process.

If the guest does not use treatment during the first personal consultation and does not appear within 1 month after that, his or her data will be deleted after 2 months. During the use of the services, the guest may provide the service provider with health data, which the service provider will process only if necessary in connection with the treatments provided by the service provider, in order to ensure the safe performance of the treatments.

Purpose of the processing of personal data: treatment of the data subject and documentation thereof, product delivery, fulfilling customer requests.

Personal data processed in connection with the conclusion of a contract: name, name at birth, mother's name, year of birth, address, social security number, telephone number, name of legal representative in the case of minors, his or her signature, test and treatment results, disease or problem underlying treatment, interventions performed, consent to treatment, delivery address, other information whose processing is necessary for the provision of services.

Data required for product orders and purchases: name, address, telephone number, e-mail.

Legal basis for data processing: based on Article 6 (1) (b) GDPR, data processing is necessary for the use of the service (fulfilment of the contract).

Data storage method: electronic and paper-based

Duration of processing: Until the purpose is fulfilled, the processing documentation is kept for a maximum of 10 years. The need to process the data is reviewed by the service provider every 2 years.

3.3 Billing

The service provider shall issue an invoice for the services used and products purchased and shall keep the invoice in accordance with the provisions of the law.

Purpose of data processing: Issuing invoices for services used, product purchases, keeping invoices, tax and accounting obligations.

Legal basis for processing: to fulfil a legal obligation under Article 6(1)(c) of the GDPR.

Duration of processing: Planned duration of processing: (according to the provisions of Act C of 2000 on Accounting; Act CXXVII of 2007 on Value Added Tax). The retention period of the copy of the invoice is 8 years.

Addressee of personal data: National Tax and Customs Administration

Data processor: Accounting office

3.4 Taking photos and filming

The process of the treatments can be accompanied and documented with the help of photos and film recording. The guest and service provider can compare the state before and after treatment. The photo and video recording can only be used with the express consent of the guest (e.g. on websites, social media, newsletter platforms).

Legal basis for processing: consent of the data subject

Categories of persons concerned: guests using the service

Personal data processed: name, photo or film recordings of the treatment process

Duration of processing: until the data subject's consent is withdrawn

3.5 Data of business partners

In order to maintain contact with its business partners and fulfil contracts, the service provider may process the personal data of the partners' contacts. In the case of collecting personal data, the data controller complies with the relevant legal regulations and adheres to ethical standards. The provided data enable easier contact as necessary, the purpose of data processing is to establish the contract, and identification of the partner cannot be achieved in any other way. The service provider firstly keeps in touch with its business partners via electronic mail.

Data processed: company name, contact name, email address, telephone number

Legal basis for processing: legitimate interest under Article 6(1)(f) GDPR

Duration of processing: 5 years from the termination of the contract.

3.6 Social media

The data controller may appear on various social media platforms in order to publicise and promote its services.

The purpose of the processing: to display advertisements tailored to the interests of the data subject and to share content about the products and services of the website, social networking.

Scope of data processed: name, profile of the user registered on social networking sites, his or her public shares, post likes, comments, and private messages.

Data subjects: All data subjects who are registered on the relevant social media page and follow the company's social networking or contacted the company's social networking site.

The legal basis for processing is the consent of the data subject pursuant to Article 6(1)(a) of the GDPR.

Duration of processing: until consent is withdrawn.

The data subject can find out about the details of data collection and data processing in the data protection policy of the given social media site.

The facebook.com also provides anonymous statistics for business pages, the company and facebook.com on this is considered a joint controller in terms of data. Further information on joint processing related to the Facebook page: (https://www.facebook.com/legal/terms/page_controller_addendum)

3.7 Sending newsletter

The service provider may send requests for advertising and other marketing purposes to the email addresses of the data subjects.

The purpose of data processing is to send the service provider a newsletter or direct marketing message to the data subject. In the newsletter the service provider can send notifications and offers in connection with its services, news, events, and promotions.

Scope of data processed: name, e-mail address

Legal basis for processing: the data subject's consent pursuant to Article 6(1)(a) of the GDPR. The data subject has the right to withdraw his or her consent and unsubscribe from the newsletter at any time.

Duration of processing: until the data subject's consent is withdrawn.

Data subjects: subscribers to the newsletter.
Data storage method: electronic and paper-based
Data processor: newsletter server

4. DATA PROCESSORS, RECIPIENTS

The data controller may use the services of third parties for the processing of personal data, provided that the third party's data processing practices comply with the relevant legal conditions. By accepting this Data Protection Regulation, those affected expressly consent to the data controller making the data at its disposal available to the service providers in a contractual relationship with it.

Processors shall carry out the processing in accordance with the instructions of the controller and shall not take any substantive decisions concerning the processing, processing of personal data which have come to their knowledge, shall solely be processed in accordance with the instructions of the controller, furthermore personal data shall be stored and retained in accordance with the controller's instructions.

The data processor may use the data subject's data solely for the performance of the contractual task, and is not entitled to retain them for further use or transfer them to third parties. The data subject's personal data will not be made available to third parties, except in the cases defined by law (e.g. in the context of criminal proceedings) or for the performance of the data controller's contractual duties.

Data processing activities in particular: accounting, invoicing program, website operation, storage services, which are provided for the data controller by an external service provider.

The controller shall only use processors that offer adequate guarantees regarding the processing of personal data, comply with the data protection legislation in force and take technical and organisational measures to protect personal data.

THE CONTROLLER USES THE FOLLOWING DATA PROCESSORS

4.1 Accounting

The data controller is in a contractual relationship with an accountancy firm for the fulfilment of accounting obligations laid down by law.

Scope of the data transmitted: Personal data necessary for issuing an invoice.

Purpose of the transfer of data: To comply with the legal requirements concerning accounting services in relation to the invoicing of data subjects.

Period of data processing: the limitation period for claims arising from a contract with an accountancy firm or until the fulfilment of the legal obligations of the accounting firm under the contract.

4.2 Invoicing program

The processor contributes to the recording of accounting documents on the basis of a contract with the controller. The data processor shall provide the name and address of the data subject to the extent necessary for the accounting records, in accordance with Section 169 (2) of the Act on Accounting and shall delete it thereafter.

Online invoicing software: szamlazz.hu

Company details: KBOSS.hu Kft., registered office: 2000 Szentendre, 22/b Táltos Street, email: info@szamlazz.hu, +36204694994, www.szamlazz.hu

Scope of data: personal data (name, address, health insurance fund card number) required to issue an invoice.

Duration of processing: for the period specified by law.

4.3 IT service provider, storage

The data controller stores the personal data it manages in the storage provided by the IT service provider.

Details of IT service provider: Rackhost Zrt. - Contact: registered office: 6722 Szeged, 41, Tisza Lajos körút, <https://www.rackhost.hu/>

4.4 Website operation

The service provider will also maintain the website according to the instructions of the data controller, no other data processing operations is performed.

Details of IT service provider: László Törös sole proprietor - Contact: laszlotoros@gmail.com

5. DATA SECURITY

The data controller takes all security measures to protect personal data from unauthorized access.

The data provided by the data subject shall be stored and managed in the service provider's electronic system and on paper with adequate protection.

In the case of electronically stored data, the data controller applies password protection, paper-based documents are stored in a lockable cabinet in a secure room. Natural persons with access to personal data may only process personal data in accordance with the instructions of the data controller.

The managed personal data can only be accessed by those persons whose knowledge of the data is essential for the performance of their duties.

The service provider selects and operates the IT tools used to manage personal data in the course of providing the service in such a way that the managed data is accessible only to those authorized to do so, its authenticity is ensured, and it is protected against unauthorized access. The service provider protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction.

The service provider uses computers of its owns during data management. The service provider takes the following security measures into account:

- The data on the computer can only be accessed with identifiable authorization (in particular: user name and password),
- if the purpose of data processing has been achieved, the deadline for data processing has expired, the file containing the data will be irretrievably deleted,
- uses pseudonymization or encryption,
- provides virus protection and a firewall on the service provider's IT devices.

When handling paper-based documents, the service provider takes the following into account:

- the data can only be seen by those authorized to do so, no one else can access them,
- documents in continuous active processing can only be accessed by those in charge, of which the employee performing data processing is aware, and closes the paper-based data carrier when the work is completed,
- documents are placed in a well-locked room, in a lockable cabinet.

With regard to the protection of data stored in the electronic information system, it ensures in particular:

- administrative and logical security measures, including protection against unauthorized access,
- the measures to ensure the recovery of data files (regular backup and separate, safe management of copies),
- the protection against codes that endanger the data file,
- the physical protection of data files and devices carrying data.

If the purpose of processing personal data stored on paper or on a physical device has been achieved, the service provider will arrange for the destruction of the paper and the appropriate management of the physical device.

DATA CORRECTION, DATA DELETION

Modification and deletion of the data provided by the data subject can be requested at any time by email or at the postal address of the data controller.

At the request of the guest, the personal data stored about him will be deleted and the printout documents related to the guest will be destroyed.

COOKIE MANAGEMENT

The purpose of cookies is to improve the user experience of websites, to provide a personalized service, and to measure the site's visitor data and operate it at an appropriate level. The technology helps the visitor's navigation and storage of settings, and can be used to ensure online transactions. A cookie is a small file containing a string of characters that the server sends to the user's computer when visiting the website. Cookies usually do not contain personal information and cannot be used to identify the user.

The user can prohibit the use of Cookies or delete them on his computer. (Depending on the browser: Settings or Options interface). Browsers usually allow the placement of cookies by default.

We can distinguish cookies according to their validity period. There are cookies that last only until the browser is closed (temporary cookie) or until the given task is completed. Certain cookies are stored on the user's computer beyond the session (permanent cookie). These can be deleted by the visitor at any time.

The information collected by internal cookies can only be processed and utilized by the given website. A website can also use external services that also use their own cookies. These are called third-party cookies. You can get more information about the processing of these cookies on the website of the service providers as data controllers.

Based on the opinion of the EU Data Protection Working Party, the data subjects must be informed in the case of the use of cookies that do not require consent.

As a data processor, the IT service provider maintaining the website has access to the personal data collected by the cookies used on the website of the data controller.

Used cookies

Cookies that are essential for the operation of the website

Essential cookies are necessary for the use of the website and for the operation of its functions, they do not collect information that is considered personal data. If they are disabled, the website and some of its parts will not be available properly or at all.

Legal basis: legitimate interest of the controller under Article 6(1)(f) GDPR

Their validity period is necessary and proportionate to achieve the goal, the minimally necessary time, the duration of the given visit, cookies are automatically deleted at the end of the session or when the browser is closed.

Name of cookie	Legal base	Service Provider	Aim, Type	Duration
_GRECAPTCHA	legitimate interest	Controller	It serves to filter spam traffic. Only allow genuine visitors to use the services.	6 month
rc::a	legitimate interest	Controller	HTML Local Storage: Used to differentiate	permanent

			between humans and bots.	
rc::f	legitimate interest	Controller	HTML Local Storage: Used to differentiate between humans and bots.	permanent
rc::d	legitimate interest	Controller	HTML Local Storage: Used to differentiate between humans and bots.	permanent

Statistical cookies

With the help of statistical cookies, we can understand how the user uses the website. Data about visitors is stored aggregated and anonymous. The company uses the Google Analytics application - Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043) to independently measure and audit website traffic and other web analytics data. Analytics also apply to tracking conversions.

Google Analytics uses so-called "cookies", text files that are saved on your computer for the purpose of analysing and evaluating the use of the website visited by the user, providing reports on the use of the website to its operator and to provide additional services related to the use of the website.

The information generated by the cookie relating to the website used by the user is usually stored by Google on one of its server in the USA.

Within the framework of Google Analytics, the IP address transmitted by the user's browser is not linked to the other data of Google. To turn off anonymous Google Analytics cookies, you can install an add-on (Google Analytics plug-in) which prevents the website from sending information about the user to Google Analytics.

Data controllers can provide detailed information on the processing of measurement data to the data subject (contact: www.google.com/analytics).

If the data subject does not want Google Analytics to measure the above data in the manner and for the purpose described, he or she can block it in the browser settings, however, please note that in this case, not all functions of the website may be available. (<https://tools.google.com/dlpage/gaoptout?hl=hu>)

Name of cookie	Legal base	Service provider	Aim	Duration
_ga – Google Analytics code	consent	Google	Statistics - Differentiation of individual users.	13 month
_ga # Google Analytics code	consent	Google	Statistics - Information on visitor usage, the number of times he or she visited the site.	13 month

Setting and disabling cookies

Cookie settings can be changed at any time in the cookie settings of the website and in the cookie settings of the browser used. Some browsers automatically accept cookies by default, but this setting can also be changed.

Quick links: Firefox, Chrome, Safari, Internet Explorer.

HANDLING PERSONAL DATA BREACHES

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

A personal data breach may cause physical, pecuniary or non-pecuniary damage to natural persons, including loss of control over their personal data or restriction of their rights, discrimination, theft or misuse of identity, financial loss, unauthorised removal of pseudonymisation, damage to reputation, damage to the confidentiality of personal data protected by professional secrecy, or other significant economic or social disadvantage to the natural persons concerned if not addressed in an appropriate and timely manner, as required by the GDPR. The data controller must report the personal data breach to the competent supervisory authority without undue delay within 72 hours of becoming aware of it, unless it can prove, in accordance with the principle of accountability, that the data breach is not likely to pose a risk to the rights and freedoms of natural persons.

In the event of a suspected infringement, the data controller shall examine the circumstances of the case and, if the examination proves that no data protection breach has occurred, it shall inform the potential notifier and close the case. Where the controller can demonstrate, in accordance with the principle of accountability, that the personal data breach is unlikely to pose a risk to the rights and freedoms of natural persons, then notification to the competent supervisory authority may be waived, subject to the necessary measures being taken. Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons the controller shall inform the data subject (guest) of the personal data breach without undue delay and take the necessary measures.

The data controller keeps records of data breaches in accordance with the provisions of the GDPR. Data contained in the register will be kept for 5 years from the date of detection of the personal data breach.

REMEDY

If the data subject has a complaint about data processing, please let us know via the contact details of the data controller. The data controller will investigate and respond to the complaint within 30 days.

If the data subject maintains his or her complaint about the processing complained of by the controller, he or she may have the right to lodge a complaint with the supervisory authority, the National Authority for Data Protection and Freedom of Information (NAIH).

Registered office: 1055 Budapest, Falk Miksa utca 9-11.

Contact: ugyfelszolgalat@naih.hu, +36-1-3911400, www.naih.hu

The data subject may also, at his or her choice, pursue his or her claim in court. The action shall be brought at the place of residence or stay of the person concerned. The tribunal has jurisdiction to hear the case, which is free of charge, and the court shall act on a priority basis.

FINAL PROVISIONS

The controller reserves the right to amend this data processing information unilaterally at any time, informing the data subjects. The information shall be communicated to the data subjects by means of publication on the website or, depending on the nature of the change by direct notification by e-mail.

The controller does not carry out any profiling when processing personal data. The controller shall review the policy every 2 years.

The data protection policies relating to the data controller's processing are available on an ongoing basis on the website. Data processing not covered by this information is disclosed prior to the processing, at the time the data is collected for the data subject.

In matters not covered by this Data Processing Information, the GDPR, or in cases permitted by it, auxiliary the rules of the Info law shall apply.