

PRIVACY POLICY
VERSION 1.0
EFFECTIVE AS OF MARCH 26, 2023

The present privacy policy (hereinafter: Policy) aims to provide data subjects with comprehensive information in consolidated form regarding all data processing activities performed on the website www.polinaphotography.com (hereinafter: Website), and in the course of the activities of the controller, in compliance with the applicable laws and regulations and professional guidelines.

I. Applicable laws and regulations

Regulation (EU) 2016/679 of the European Parliament and of the Council 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);

Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Information Act);

Act V of 2013 on the Civil Code of Hungary (hereinafter: Civil Code);

Act C of 2003 on Electronic Communications; and

Act C of 2000 on Accounting

II. Definitions

“Data Subject” shall mean a natural person who has been identified or is identifiable by reference to any information;

“Identifiable natural person” shall mean a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“Personal data” shall mean any information relating to a data subject;

“Sensitive data” shall mean data included in the special categories of personal data, such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, furthermore, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation;

“Consent” shall mean any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which the data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

“Controller” shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

“Joint controller” shall mean the controller, who determines the purposes and means of processing jointly with one or more other controllers;

“Processing” shall mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Data forwarding” shall mean making data available to a specific third party;

“Restriction of processing” shall mean the marking of stored personal data with the aim of limiting their processing in the future;

“Third party” shall mean a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

“EEA Member State” shall mean any Member State of the European Union and any State that is a party to the Agreement on the European Economic Area, furthermore, any other country whose citizens are enjoying the same treatment as nationals of States who are parties to the Agreement on the European Economic Area by virtue of an agreement between the European Union and its Member States and a State that is not a party to the Agreement on the European Economic Area;

“Third country” shall mean any State other than EEA Member States;

III. The Controller

Information concerning the Controller:

Name:

Company registration number:

VAT number:

Registered office:

E-mail:

Telephone:

IV. Information concerning processing activities

1. Request for quotation

Grounds for processing:	Consent of the data subject [Article 6(1)a of GDPR]
Purpose of processing:	The Controller sends an appropriate quotation to the data subject, which can form the basis for establishing a possible contractual relationship.
Scope of personal data processed:	Name; E-mail; Telephone; Date and time of photo shooting; Any and all other personal data provided voluntarily.
Term of processing:	Until the withdrawal of the consent of the data subject, but no longer than 3 months.

2. Contact/Inquiry

Grounds for processing:	Consent of the data subject [Article 6(1)a of GDPR]
Purpose of processing:	Adequate response to inquiries from data subjects
Scope of personal data processed:	Name; Telephone; E-mail; Name of Instagram account; Type of photo shooting; Date and time of photo shooting; Any and all other personal data provided by the data subjects in the course of the individual inquiries.
Term of processing:	Until the withdrawal of the data subject.

3. Entering into contracts

Grounds for processing:	The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [Article 6(1)b of GDPR]
Purpose of processing:	Entering into contract, proper performance of contract, facilitating the enforcement of civil law claims that may arise from the contract.
Scope of personal data processed:	Name; Address; Email address; Phone number; ID number
Term of processing:	5 years

4. Invoicing

Grounds for processing:	The processing is necessary for compliance with a legal obligation to which the controller is subject [Article 6(1)c of GDPR]
Purpose of processing:	The Controller uses the website számlázz.hu in order to issue invoices fully compliant with the applicable legislation.
Scope of personal data processed:	Name; Address; Bank account number.
Term of processing:	8 years

5. Newsletter

Grounds for processing:	Consent of the data subject [Article 6(1)a of GDPR]
Purpose of processing:	Informing the data subjects of information concerning the activities, initiatives, programs, and possible advertisements of the Controller.
Scope of personal data processed:	Name; E-mail;
Term of processing:	Until the withdrawal of the consent of the data subject

V. Processors, recipients and third countries

Unless being subject to a statutory obligation or a demand issued by any authority to do so, the Controller does not forward personal data to third parties, third countries or international organizations.

The Controller involves the following processors:

- in the course of the processing related to invoicing, the Controller forwards personal data to the website számlázz.hu (company name: KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság, registered office: 1031 Budapest, Záhony utca 7., company registration number: 01-09-303201, VAT number: 13421739-2-41, privacy policy (in Hungarian): <https://www.szamlazz.hu/adatvedelem/>) to the extent necessary, in utmost compliance with the data security requirements.
- in the course of the processing related to newsletters, the Controller involves the following provider The Rocket Science Group (company registration number: USTX0802837210, VAT number: 582554149, registered office: LLC 675 Ponce de Leon Ave NE Suite 5000. Atlanta, GA 30308 USA)

The Controller placed hyperlinks on its website, which may refer to websites operated by third parties independent of the Controller, the Controller has no control over the contents of such third party-operated websites. The Controller shall accept no liability for the processing activities carried out on such third party websites.

VI. Cookies

When the data subject visits the Website, a small data file called a “cookie” (hereinafter: “cookie”) is downloaded to the computer of the data subject, which may serve for various purposes.

The Website uses the following cookies:

Session cookies

Session cookies are necessary for browsing the website, using the functions, among other things, they allow the visitor to comment on the actions performed on a given page, function or service. Without the use of “session cookies”, the smooth use of the website cannot be guaranteed. Their validity period extends to the duration of the given visit, these “cookies+ are automatically deleted at the end of the session or when the browser is closed.

Convenience cookies

These cookies enable the website to remember which mode of operation you have chosen (for example: you have consented to the cookie policy and selected the sorting method, according to which the elements of the search result list are displayed). This is done so that on the next visit you do not have to give your consent to the cookie policy again and again or set the sorting principle according to which you want to view the content displayed on the page. Without the information contained in the cookies that store preferences, our website may function less smoothly.

Name of the cookie	Type of the cookie	Grounds for processing:	Scope of personal data processed:	Term of processing:
_fbp	Marketing	Consent of the data subject [Article 6(1)a of GDPR]	To store and track visits across websites.	3 months
_ga	Statistic	Consent of the data subject [Article 6(1)a of GDPR]	To store and count pageviews.	2 years
_ga_SJ9XHX86DZ	Statistic	Consent of the data subject [Article 6(1)a of GDPR]	To store and count pageviews.	1 year
_gat_gtag_UA_128391877_1	Statistic	Consent of the data subject [Article 6(1)a of GDPR]	To store a unique user ID.	1 minute

_gat_Ua-128391877-1	Functional	Consent of the data subject [Article 6(1)a of GDPR]	To provide technical monitoring.	End of the session
_gid	Statistic	Consent of the data subject [Article 6(1)a of GDPR]	To store and count pageviews.	24 hours

VII. Data security

The Controller pays particular attention to complying with data security requirements, so the Website was designed with full consideration of data security aspects.

The Controller implemented the following data security measures in the course of the development of the Website:

- Application of the https protocol, considering that in the case of the http protocol, anyone can monitor the Internet traffic and intercept the personal data of the users, because in the case of this protocol, the communication takes place in an easily readable form (plain text), not encrypted;
- The personal data provided shall not be collected in a separate database.

VIII. Rights of data subjects

Right to withdraw consent

In the case of data processing based on consent, the data subject is entitled to withdraw his consent at any time. The withdrawal of consent does not affect the legality of consent-based data processing prior to withdrawal.

Right to request information

The data subject is entitled to request information in writing from the Controller regarding the processing of his personal data. Within one month, the Controller informs the data subject in writing about the purpose, legal basis, scope of the data processed, duration of data processing, source of data, possible data transfer, etc.

Right to rectification

The data subject is entitled to request the Controller in writing to clarify, supplement or modify the personal data relating to him (e.g. in the event of incorrect data collection or subsequent data change). Within one month, the Controller informs the data subject in writing about the completion of the clarification, addition and modification.

Right to erasure

The data subject is entitled to request the Controller in writing to delete the personal data relating to him. If the Controller is not obliged by law to retain the data, the Controller deletes the personal data indicated in the request within 5 working days and informs the data subject in writing about this.

Right to restrict processing

The data subject is entitled to request the Controller in writing to restrict the processing of personal data relating to him. For example, processing may be restricted (blocked) if the data subject intends to use the blocked personal data for enforcement before a court or authority. The Controller may process the blocked personal data only with the consent of the data subject, with the exception of storage, or in order to submit, enforce or defend legal claims or to protect the rights of other natural or legal persons, and is also obliged to clearly indicate the fact of blocking and to process the blocked personal data separately.

Right to data portability

The data subject is entitled to request in writing the Controller to send the personal data relating to him in a delimited, widely used, machine-readable format, and he is entitled to transfer this data to another controller without being hindered by the Controller.

The right to data portability may be exercised in the following cases:

- the processing is based on the consent of the data subject; or
- data processing is necessary for the performance of a contract in which the data subject is also a contracting party (including where, at the request of the data subject, steps are taken prior to the conclusion of the contract); and
- data processing is carried out in an automated manner.

The data subject may request the Controller to transfer his personal data directly between data controllers, if this is technically feasible.

Right to protest

The data subject is entitled to object to the processing of his personal data based on the legitimate interest of the Controller or a third party, including profiling based on those provisions, for reasons related to his or her situation. In this case, the Controller may no longer process the personal data unless the Controller proves that the processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject or which relate to the submission, enforcement or protection of legal claims.

Enforcement of rights and remedies

The data subject is entitled to contact the Controller directly if he has questions about the processing of his personal data or wishes to exercise his data protection rights.

In case of violation of data protection rights, the data subject can apply for redress to the National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11, postal address: 1363 Budapest, Pf.: 9., phone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu).

If the processing of the data subject's personal data is carried out unlawfully, the data subject is entitled to file a litigious action against the Controller. The person concerned may also bring the case before the court of his place of residence (<https://birosag.hu/torvenyszekek>).

Dated in Budapest, on March 26, 2023.