

PRIVACY POLICY

OUR PRIVACY POLICY

AT A GLANCE

1. WHO WE ARE.

Győr-Moson-Sopron Megyei Önkormányzat.

2. WHAT WE USE YOUR DATA FOR.

We will use your data (collected online or in person), among other purposes, to manage your registration as a user, to respond to your queries, and, if you wish, to send you our customised communications.

3. WHY WE USE YOUR DATA.

We have legal standing to process your data for various reasons. The main reason is that we need to process your data to perform the contract that you accept with us when you register and when you enjoy any of our services or functionalities. We also use your data for other reasons, for example, to respond to your queries or to send you newsletters that you have asked to receive from us.

4. WHO WE SHARE YOUR DATA WITH.

We share your data with service providers who provide us with assistance or support, these being companies third party providers, both inside and outside the European Union.

5. YOUR RIGHTS.

You have the right to access, rectify or delete your personal data. In certain cases, you are also entitled to other rights, such as, for example, to object to us using your data, or to transferring your data, as explained in depth below. See more. We encourage you to read our full Privacy Policy below to understand in depth the manner in which we will use your personal data and your rights over your data.

BEFORE YOU START ...

- In this Privacy Policy, you will find all relevant information applicable to our use of our users' and clients' personal data, regardless of the channel or means (online or in person) that you use to interact with us.
- We are transparent about what we do with your personal data, to help you to understand the implications of the way in which we use your data, and the rights you are entitled to in relation to your data:
 - o We permanently make available for you all the information included in this Privacy Policy, that you can check when you consider appropriate, and in addition,
 - o you will also find further information on how we use your data as you interact with us.
- These are some terms we regularly use in this Privacy Policy:
 - o When we speak about our Platform, we refer, in general, to any of the channels or means, digital or in person, you may have used to interact with us. The main ones are:
 - Our Website, www.sacravelo.eu
 - Our SacraVelo App, the mobile application you installed on your mobile device.
 - In person, in Győr-Moson-Sopron Megyei Önkormányzat.

1. WHO IS THE CONTROLLER OF YOUR DATA?

Your data controller is:

Győr-Moson-Sopron Megyei Önkormányzat

Postal Address: H-9021 Győr, Városház tér 3.

E-mail address of the Data Protection Officer: gdpr@gymsmo.hu

Hosting provider: Infoartnet Kft.

Postal Address: H-9025 Győr, Somos u. 1. (first floor)

E-mail address: info@infoartnet.hu

2. WHY WE PROCESS YOUR PERSONAL DATA

Depending on the purpose for which we process your data from time to time, as explained above, we need to

process one or other data, which will in general be, depending on each case, as follows:

- your identity data (for example, your name, surname, language and country from which you interact with us, contact data, etc.);
- connection, geolocation and/or browsing data;
- information about your tastes and preferences.

Remember that, when we ask you to fill in your personal data to give you access to any functionality or service of the Platform, we will mark certain fields as compulsory, since this is information that we need to be able to provide the service or give you access to the functionality in question. Please take into account that, if you decide not to make such data available to us, you may be unable to complete your user registration or may not be able to enjoy those services or functionalities.

Depending on how you interact with our Platform, i.e., depending on the services, products or functionalities that you wish to enjoy, we will process your personal data for the following purposes:

PURPOSE	+ info
1. To manage your registration as user of the Platform	If you decide to become a registered user of our Platform, we need to process your data to identify you as a user of the Platform and grant you access to its various functionalities, products and services available to you as a registered user. You may cancel your registered user account by contacting us.
3. To meet requests or applications that you make through the Customer Support channels	We only process the personal data that are strictly necessary to manage or resolve your request or application.
4. For marketing purposes.	This purpose includes the processing of your data, mainly, for: <ul style="list-style-type: none">- To disseminate in the Platform or through our channels in the social networks photographs or pictures that you shared publicly, provided that you expressly give us your consent for the purpose.
5. Analysis of usability and quality to improve our services	If you access our Platform, we inform you that we will treat your browsing data for analytic and statistic purposes, i.e., to understand the manner in which users interact with our Platform and thus be capable of introducing improvements in the Platform. In addition, we occasionally perform quality surveys and actions to know the degree of satisfaction of our customers and users and detect those areas in which we may improve.

3. HOW WE ARE LEGALLY PERMITTED TO PROCESS YOUR DATA?

The legal terms on which we are permitted to process your personal data also depends on the purpose for which we process them, as explained in the following table:

Purpose	Legal standing
1. To manage your Platform user registration	We process your data because this is necessary on the terms regulating the use of the Platform. In other words, for you to be able to register as a user on the Platform, we need to process your personal data, since we would otherwise be unable to manage your registration.
3. Customer Support	We consider that we have legitimate interest in answering the requests or queries raised by you through the existing different contact channels. We understand that the processing of these data is also beneficial to you to the extent that it enables us to assist you adequately and answer to the queries raised. When your query is related to the exercise of your rights on which we inform you below, we are legally permitted to process your data for compliance with our legal obligations.
4. Marketing	We are legally permitted to process your data for marketing purposes due to the consent that you give us, for example when you publish your pictures on the Platform or on our social networks' channels.
5. Analysis of usability and quality	We consider that we have a legitimate interest in analysing the Platform usability and the user's satisfaction degree, since we understand that that the processing of these data is also beneficial for your because the purpose is to improve the user experience and provide a higher quality service.

4. HOW LONG WILL WE KEEP YOUR DATA?

The time for which we will keep your data will depend on the purposes for which we process them, as explained below:

Purpose	Time for which the data are kept
1. To manage your Platform user registration	We will process your data for the time during which you remain a registered user (meaning, until you decide to unsubscribe).
3. Customer Support	We will process your data for the time necessary to meet your request or application.
4. Marketing	We will process your data until you unsubscribe.
5. Analysis of usability and quality	We will process your data occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymise your browsing data.

Notwithstanding the fact that we will process your data for the time strictly necessary to achieve the purpose in question, we will subsequently keep them duly stored and protected for the time during which liability may arise for their processing, in compliance with legislation in force from time to time. Once each of the potential actions is timebarred we will proceed to delete the personal data.

5. DO WE SHARE YOUR DATA WITH THIRD PARTIES?

To achieve the purposes mentioned in this Privacy Policy, we must give access to your personal data to entities third parties that provide us with support in the services that we offer your, i.e.:

- technological service providers,
- providers of customer support related services,
- advertising and marketing related partners and service providers.

6. WHAT YOUR RIGHTS ARE WHEN MAKING YOUR DATA AVAILABLE TO US

We undertake to keep your personal data confidential and to ensure that you may exercise your rights. Bearing that in mind, we Joint Controllers have agreed that you may exercise your rights free of charge by writing us an email to a single e-mail address (gdpr@gymsmo.hu), simply informing us of the reason for your request and the right that you wish to exercise.

In particular, notwithstanding the purpose or legal basis we use to process your data, you have the following rights:

- To request access to your personal data that we hold. We remind you that where you are a Platform registered user you may also consult this information in the relevant section of your online account.
- To request that we rectify the personal data that we hold. Please bear in mind that if you are a registered user on the Platform, you may also access the relevant personal data section of your online account to change or update your personal data. In any case, please take into account that, on actively making your personal data available to us through any procedure, you guarantee that they are true and accurate and you undertake to notify to us any change or modification of your data. You will be liable for any loss or damage caused to the Platform or to the person responsible for the Platform or to any third party by reporting erroneous, inaccurate or incomplete information in the registration forms. Please remember that, as a general rule, you must provide us only with your own data, not with those of third parties, other than to the extent otherwise permitted in this Privacy Policy.
- To request that we erase your personal data to the extent that they are no longer necessary for the purpose for which we need to keep processing them, as we have explained above, or when we are no longer legally permitted to process them.
- To request that we cancel or limit the processing of your personal data, which entails that in certain cases you can request us to temporally suspend the processing of the data or that we keep them longer that necessary.

If you have given us your consent to process your data for any purpose, you also have the right to withdraw such consent at any time. Some of the circumstances in which you may withdraw your consent are detailed in section 2 where we explain for which purposes we process your data.

When we are legally permitted to process your data due to your consent or to for the purposes of a contract, as explained in section 3, you will also have the right to request the portability of your personal data. This means that you will have the right to receive the personal data that you made available to us in a structured, commonly used and machine-legible format, to be able to transmit them to another entity directly without impediments on our part.

In addition, where the processing of your data is based on our legitimate interest, you will also have the right to object to the processing of your data.

Finally, we inform you that you have the right to file a claim before the responsible data protection regulatory authority, in particular, before:

Hungary: <https://naih.hu/about-the-authority>

Slovakia: <https://dataprotection.gov.sk/uouu/en>

7. CHANGES TO THE PRIVACY POLICY

We may amend the information contained in this Privacy Policy when we consider this appropriate. Should we do so, we will notify you by various procedures through the Platform (for example, through a banner, a pop-up or a push notification), or we may even send you a notice to your e-mail address when the change in question is relevant to your privacy, for you to be able to review the changes, assess them and, as the case may be, object or unsubscribe from any service or functionality. In any case, we suggest you to review this Privacy Policy from time to time in case minor changes are made or we make any interactive improvement, taking the opportunity that you will always find it as a permanent point of information on our Website and our App.

8. INFORMATION ON COOKIES

We use cookies and similar devices to facilitate your browsing in the Platform, understand how you interact with us and, in certain cases, to be able to show you advertisements in accordance with your browsing habits. Please read our Cookies Policy to understand with greater detail the cookies and similar devices that we use, their purpose and other information of interest.