

**DATA PROCESSING INFORMATION SHEET
for the webshop operated by the Liszt Ferenc Academy of Music**

Valid: 24. February 2022

The present data processing information sheet contains the information regarding the data processing in connection with the webshop operated by the Liszt Ferenc Academy of Music on the website webshop.zeneakademia.hu (hereinafter: Webshop) in order to provide customers and visitors to the website with the most comprehensive information possible on the processing of their personal data.

Data Controller: Liszt Ferenc Academy of Music (Seat: HU-1061 Budapest, Liszt Ferenc tér 8.; represented by: Dr. Andrea Vigh rector and László Zoltán Szentgyörgyvölgyi chancellor; [web: lfze.hu/kapcsolat](http://web.lfze.hu/kapcsolat) hereinafter: Service Provider).

The Service Provider as data controller shall make every effort to comply with the provisions of Act No. CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter: Info. Act) and the provisions set out in the 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, hereinafter: GDPR) and further related legal provisions.

The Service Provider has a Data Protection Officer, dr. Éva Kujalek, Data Protection Officer (E-Mail: adatkezeles@zeneakademia.hu, further contact data of the Data Protection Officer: lfze.hu/adatvedelmi-tajekoztato).



I. General information regarding the data processing:

1. The purpose of the data processing is to ensure the services available in the Webshop properly. The Service Provider does not use the provided personal data for purposes other than those described in the present data processing information sheet.
2. The Service Provider does not control the correctness of the personal data provided by the customer using the services of the Webshop (hereinafter: Customer). The Customer shall solely be liable for the correctness of the personal data provided to the Service Provider. Furthermore, the Customer undertakes to be liable for the fact that exclusively he is the one using the service from the E-Mail address provided.
3. The Service Provider makes the Customer aware of the fact that the Customer shall be liable for keeping the personal data up to date. If the Customer fails to update his personal data, the Service Provider shall not be liable for any damages resulting from this.
4. Registered users have the possibility to modify their personal data in the profile data / data modification tab after "Login".
5. In case of the deletion or modification of the personal data, the previous data cannot be restored any longer.
6. If the Customer does not provide his own personal data (e.g., name and delivery address of a third party) the Customer shall be liable to ensure the lawfulness of the data provision.
7. Unless otherwise provided for by the legal provisions or the present data processing information sheet, the Service Provider processes the personal data of the Customer until the Customer unsubscribes from the service in the menu profile data / modify data / delete profile.
8. The Service Provider makes the Customer's personal data available to authorized third parties in cases specified by the legal provisions (e.g., in the event of a court or police request, copyright infringement or reasonable suspicion thereof). The Service Provider shall be entitled and obliged to forward to the competent authorities any personal data available to it and stored by it ordinarily, to which the Service Provider is obliged by law or by a final decision of an authority.



II. Information regarding the data processing during the use of the Webshop

1. Registration and login

The registration is not required for the purchase in the Webshop, the possibility of purchase is ensured also without the registration, however, creating a customer account makes the purchase easier as it is not necessary to provide personal data every time when using the Webshop.

The purpose of the data processing:	Recording of the Customer's data and keeping contact in order to facilitate the use of the service. In case of log in, the purpose of data processing is to identify the Customer, to provide the possibility to modify and delete personal data and to simplify the ordering process.
Legal basis of the data processing:	Consent of the Customer, Article 6. Subsection 1 lit. a) GDPR
Categories of the data subjects:	The Customers who register themselves in the Webshop, i.e., who create a user account.
Categories of personal data	a) Name; b) E-Mail; c) Password; d) Telephone or mobile phone number. e) Invoicing data: <ul style="list-style-type: none">➤ Country;➤ Postcode;➤ City;➤ Street and house number. f) Delivery data (if these are different from the invoicing data): <ul style="list-style-type: none">➤ Country;➤ Postcode;➤ City;➤ Street and house number.
Duration of the storage:	Until the withdrawal of the consent.
Recipients:	Employees of the Service Provider who manages the administration surface of the Webshop. Data processor used by the Service Provider for the purpose of hosting services.
Are you obliged to provide the personal data?	In case of registration, the provision of all personal data is mandatory (in case of the telephone number it is sufficient to provide a mobile telephone or a telephone number).



Automated decision-making	None.
Data transfer to third countries	None.

2. Information about placing an order in the Webshop

The purpose of the data processing:	Fulfillment of the orders (contracts) placed in the Webshop, related to that, the documentation of the purchase and payment, issuing accounting documents.
Legal basis of the data processing:	Article 6 Subsection 1. lit. b), c) and f) GDPR The Service Provider processes the personal data of the Customer for the purposes of concluding and performing the contract on the basis of legal obligations and legitimate interests. Relevant legal provisions: a) Act No. C of 2000 on Accounting; b) Act No. CL of 2017 on the Rules of Taxation; c) Act No. CVIII of 2001 on certain aspects of electronic commercial services and information society services; d) Act No. CLIX of 2012 on Postal services; e) Act No. CLV of 1997 on Customer Protection; f) NGM Decree No. 19/2014 (29.IV.) on the procedural rules for handling warranty and guarantee claims for goods sold under a contract between a customer and a company
Categories of the data subjects:	The Customer who purchases goods and places an order in the Webshop (concludes a contract).
Categories of personal data:	a) Order No.; b) Date of the order; c) Name; d) Telephone number; e) E-Mail; f) Name, quantity, purchase price of the purchased products; g) Selected payment and delivery method; h) Invoicing data; i) Delivery data.
Duration of the storage:	The Services Provider processes the personal data of the Customer after the fulfillment of the concluded contract based on the legal obligation and the legitimate interest.



	<p>In case of withdrawal from the order, personal data relating to the order shall be retained until the statute of limitations calculated from the date of withdrawal has expired.</p> <p>In order to be able to fulfill the guarantee claims, the Services Provider shall retain, in any case, the data specified in point D in order to comply with the guarantee claim of the Customer.</p>
Recipients:	<p>The Employees of the Service Provider who manage the administration surface of the Webshop. The Employees of the Economic Directorate of the Service Provider in order to carry out the tasks regarding the issuing of the invoice.</p> <p>The data processor used by the Service Provider for hosting services.</p>
Are you obliged to provide the personal data?	Yes, the provision of personal data is essential for the fulfilment of the order.
Automated decision-making	None.
Data transfer to third countries	None.

A. Information regarding the delivery:

The Service Provider shall deliver the products ordered in the Webshop via the Magyar Posta Zrt. (MPL Postal Parcel) to the Customer. The Service Provider provides the following data to the Magyar Posta Zrt. in the interest of the delivery: name, delivery address, telephone number, E-Mail address.

The Service Provider processes the data necessary for the delivery also for the purpose of fulfilling the contract (Article 6 Subsection 1 lit. b) GDPR – fulfilment of the contract.)

The transfer of data is necessary for the performance of the universal postal service as a task in the public interest in case of using Magyar Posta Zrt. (Article 6 Subsection 1 lit. e) GDPR).

The services provided by Magyar Posta Zrt. shall be governed by the data processing regulations of Magyar Posta Zrt., which are accepted by the Customer by reading the present data processing information sheet.

https://posta.hu/adatkezelesi_tajekoztato#2.

In the interest of the fulfillment of its universal postal service obligation, Magyar Posta Zrt. shall process the personal data necessary for the fulfillment of the universal postal service agreement, the settlement, certification and retrospective control of the fulfillment for a period determined by the legal provisions (Section 54 Subsection 1, Section 55 Subsection 7 of the Act No. CLIX of 2012 on postal services).



B. Information on payment by credit card

The payment in the Webshop is possible exclusively by credit card.

The payment by credit card is made through the OTP Simple Pay system:

<https://simplepay.hu/vasarloknak/>.

The data entered during the payment process are not stored by the Service Provider, they are processed by OTP Simple Pay and are subject to the data protection provisions of OTP Simple Pay.

<https://simplepay.hu/adatkezelesi-tajekoztatok/>

C. Information regarding the issuing of an electronic invoice

The Service Provider issues electronic invoices with the assistance of KBOSS.hu Kft.

The data processing information sheet of KBOSS.hu Kft. is available at:

<https://www.szamlazz.hu/adatvedelem/>

The purpose of the data processing is to fulfil the invoicing obligation related to the performance of the contract (Article 6 Subsection 1 lit. c) GDPR – legal obligation).

The Service Provider transfers the following data necessary for issuing the electronic invoice to KBOSS.hu Kft. (Seat: HU-1031 Budapest, Záhony utca 7., tax number: 13421739-2-41): invoicing name and address (in case of a taxpayer: tax number).

Duration of the data processing: the invoice will be kept for a period determined by the legal provisions (Section 169 Subsection 2 Accounting Act – at least 8 years).

D. Handling of complaints and guarantee claims

If the Customer submits a complaint or a guarantee claim to the Service Provider regarding the product, the Service Provider shall process the following personal data in connection with the claims:

- a) in case of complaints: order number, name, address, E-Mail address of the Customer, name and purchase price of the product, date and method of filing the complaint, detailed description of the complaint of the Customer, list of documents and other evidence presented by the Customer, personal data voluntarily provided by the Customer, personal data used in the assessment of the complaint, personal data contained in the response to the complaint;
- b) in case of guarantee claims: order number, name, address, E-Mail address of the Customer, name and purchase price of the product, date of fulfillment of the order (contract) by the Service Provider, date of notification of the defect, description of the defect, the right the Customer wishes to exercise on the basis of the guarantee claim, furthermore the method of settlement of the warranty or guarantee claim or the reason for rejecting the claim or the right to exercise the claim.

The purpose of the data processing is to handle complaints and guarantee claims, to keep related documents, to return the product to the Service Provider for repair or replacement, and to redeliver the replaced/repaired product.

The data processing is carried out on the basis of the legal obligation applicable to the Service Provider (Article 6 Subsection 1 lit. c) GDPR) (Section 17/A Subsections 3-5 of the Act No. CLV of 1997 on customer protection and Section 4 Subsections 1 and 6 of



the NGM Decree No. 19/2014 (29.IV.) on the procedural rules for handling warranty and guarantee claims for goods sold under a contract between a customer and a company).

Duration of data processing: in case of a complaint, 5 years from the date of receipt of the complaint by the Service Provider, in case of a guarantee claim, 3 years from the date of receipt of the guarantee claim.

Magyar Posta Zrt. (MPL Postal Parcel) carries out the delivery of the product affected by the guarantee claim to the Service Provider and the repaired/replaced product to the Customer.

The legal basis of the data transfer is Article 6 Subsection 1 lit. e) GDPR with regard to the fact that the processing of the data is necessary for the fulfillment of the universal postal service as a task in the public interest.

3. Other data processing during the use of the Webshop

A. Recommendation of the product to a friend:

The Webshop offers the possibility to recommend a product to a friend, no registration is required to use this function.

Personal data provided when using this function:

- a) E-Mail address of the friend;
- b) Name of the person recommending the product;
- c) E-Mail address of the person recommending the product;
- d) Message.

The data provided will not be stored in the system of the Webshop after the message has been sent.

B. Questions regarding the products

It is possible to raise questions regarding the products in the Webshop.

Personal data to be provided when using this function:

- a) Name;
- b) E-Mail address;
- c) Telephone number (optional);
- d) Question raised.

The data provided when using this function will not be stored in the system of the Webshop. The Service Provider will delete the E-Mail addresses of those raising questions regarding the products until the end of the respective year at the latest.



4. Information on the use of cookies

When visiting the website, small data files called cookies (hereinafter: cookies) are stored in the browser using the website for the following purposes:

A. Session cookies

Session cookies are necessary for browsing the website and using its features, including allowing the visitor to note actions taken by the visitor on a particular page, feature or service. Without the use of session cookies, a smooth use of the website cannot be guaranteed. They are valid for the duration of the visit and are automatically deleted at the end of the session or when the browser is closed.

B. Comfort cookies supporting the use

These cookies allow the website to remember which mode of operation or settings the website user has chosen (e.g.: accepted the cookie information, changed the product list view, specified the sorting criteria for search results, switched to mobile view etc.). This is carried out in order to avoid having to set them again and again during the next visit.

The Service Provider does not record any personal data in comfort cookies. Comfort cookies are stored by the browser of the client's computer for up to 365 days but can be removed at any time through the browser's privacy settings.

If the webshop is opened in a private browser window (incognito mode) the comfort cookies are also deleted by closing the window of the browser.



III. Access to data and data security measures, data processors:

In connection with the carry out of the tasks regarding the Webshop, the following persons may have access to the personal data:

- a) appointed employees of the Zoltán Kodály Institute of Music Education – the tasks regarding the operation of the Webshop are carried out by the Zoltán Kodály Institute of Music Education;
- b) appointed employees of the Economic Directorate – tasks regarding the invoicing;
- c) in case of IT support, the employees of the IT department.

The employees of the Service Provider may exclusively know and process personal data in connection with the tasks concerning the Webshop.

The Service Provider shall take appropriate measures to protect personal data against, i.a. unauthorized access or unauthorized alteration.

The Service Provider shall make every effort to ensure that no data breach occurs, otherwise it will respond to the breach and make appropriate notifications within the time limits set out in the GDPR and its internal rules, up to a maximum of 72 hours.

The Service Provider shall regularly test the effectiveness of the technical and organizational measures taken to ensure the security of data processing.

Data processors used by the Service Provider:

- a) Webshop provider of the Service Provider: UNAS Online Kft. (Seat: 9400 Sopron, Kőszegi út 14., tax number: 14114113-2-08, website: www.unas.hu)
- b) Service Provider used for issuing electronic invoices: KBOSS.hu Kft. (Seat: 1031 Budapest, Záhony utca 7., tax number: 13421739-2-41, website: <https://www.szamlazz.hu/>)
- c) Magyar Posta Zrt. (Seat: 1138 Budapest, Dunavirág utca 2-6., tax number: 10901232-2-44, website: <http://www.posta.hu>).



IV. Rights regarding the data processing:

- a) access to personal data – access to data processed by the Service Provider may be requested;
- b) information on personal data – information on personal data processed by the Service Provider may be requested;
- c) rectification of personal data - in case of incorrect data processing, the correction, rectification of the personal data may be requested;
- d) restriction of the processing of personal data – the restriction of the processing of personal data may be requested (e.g. in case of contestation of the correctness of personal data);
- e) right to object to processing (if the legal basis of the data processing is: legitimate interest or the carry out of a task is in the public interest – Article 6 Subsection 1 lit. e) and f) GDPR – in the event of an objection, the Service Provider cannot process the personal data any longer, unless it proves that the data processing is reasoned by such compelling legitimate grounds which override the interests, rights and freedoms of the data subject or which are related to the submission, enforcement or protection of legal claims;
- f) right to data portability (if the legal basis of the data processing is the voluntary, express consent of the data subject or the contract concluded with the data subject – Article 6 Subsection 1 lit. a) and b) GDPR – the provision of personal data in a structured, commonly used and machine-readable format and the transmission of these data to another controller may be requested;
- g) erasure of personal data – if there is no other legal basis for the data processing, the erasure of personal data may be requested;

With regard to personal data processed on the basis of a consent, the consent may be withdrawn at any time. In case of withdrawal of consent, the Service Provider shall delete the personal data. The withdrawal of consent shall not affect the lawfulness of the processing based on the consent prior its withdrawal.

In order to exercise the rights concerning the processing of personal data, you may contact the employees of the Service Provider, who will respond to your request as soon as possible but within 15 days at the latest. Contact: adatkezeles@zeneakademia.hu

V. Legal Remedies in relation to data processing:

1. In case of complaints regarding the data processing of the Academy, the complaint may be addressed to the Data Protection Officer of the Service Provider, who will investigate the issue.
2. You may also contact the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság) (Seat: 1055 Budapest, Falk Miksa u. 9-11., postal address: 1363 Budapest, Pf. 9., E-Mail: ugyfelszolgalat@naih.hu; website: <http://www.naih.hu>).
3. In case of unlawful data processing, it is also possible to contact the court (<https://birosag.hu/a-birosagi-szervezet>).