

Privacy Policy

for visitors and registered users of the websites
adiabatikus-hutes.hu

Purpose of Data Processing

By creating and publishing this Privacy Policy, the Data Controller ensures the data subject rights defined in Chapter III of the GDPR by defining the practical implementation of data protection principles and the data protection processes carried out by the Data Controller.

This Policy defines the personal data processed by the Data Controller and by data processors commissioned by the Data Controller, their sources, the purpose, legal basis and duration of the processing, the name and address of the data processors involved in the processing, and the activities related to data processing. Furthermore, in the event of personal data transfer, the legal basis and the recipient of such transfer are also specified.

Another purpose of this Policy is to provide a unified structure for all data processing procedures carried out by employees and persons in any contractual relationship with the Data Controller who participate in data processing activities.

Through this Policy, the Data Controller aims to ensure the enforcement of constitutional principles of data protection and data security requirements, and to prevent unauthorized access to data, as well as their unauthorized alteration or disclosure.

The personal scope of this Policy extends to all persons who, based on any legal relationship with the Data Controller (especially employment, contractual or data processing relationships), have access to or obtain personal data.

The material scope of this Policy covers all data processing activities in which personal data as defined in Article 4(1) of the GDPR are processed.

Data Controller

Company name: Autent Solutions Kft.

Registered office: 1037 Budapest, Erdőalja út 147/B, Hungary

Site: 4142 Zsáka, Táncsics u. 3., Hungary

Tax number: 14259661-2-41

Company registration number: 01-09-350493

Phone: +36 1 433 27 86

Email: info@autentsolutions.hu

Person responsible for the policy: Csordás Zoltán

Availability of the privacy notice:

4142 Zsáka, Táncsics u. 3., Hungary

Date of entry into force:

14 October 2025

Definitions

User / Visitor / Data Subject

Any identified or identifiable natural person whose personal data are processed.

Personal Data

Any information relating to an identified or identifiable natural person (“data subject”).

An identifiable natural person is one who can be identified directly or indirectly, particularly by reference to an identifier such as a name, number, location data,

online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

Special Categories of Data

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health status, sexual life, or criminal records.

Consent of the Data Subject

Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies agreement to the processing of personal data relating to him or her.

Objection

A declaration by the data subject objecting to the processing of personal data and requesting the termination or deletion of the data.

Data Controller

The natural or legal person who determines the purposes and means of processing personal data.

Data Processor

A natural or legal person who processes personal data on behalf of the data controller.

Processing

Any operation performed on personal data such as collection, recording, organization, structuring, storage, retrieval, consultation, use, disclosure, restriction, erasure or destruction.

Data Breach

A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

Principles of Data Processing

1. **Lawfulness and Fairness**
Personal data shall be processed lawfully and fairly.
2. **Transparency**
The processing of personal data must be transparent for the data subject.
3. **Purpose Limitation**
Personal data shall be collected for specified, explicit and legitimate purposes.
4. **Data Minimisation**
Personal data must be adequate, relevant and limited to what is necessary.
5. **Voluntary Data Provision**
The data subject provides personal data voluntarily.
6. **Accuracy**
Personal data must be accurate and kept up to date.
7. **Storage Limitation**
Personal data shall be stored only for as long as necessary.
8. **Integrity and Confidentiality**
Data must be processed securely with appropriate technical and organisational measures.
9. **Accountability**
The data controller is responsible for compliance and must be able to demonstrate it.

Legal Background

The following legislation forms the legal basis of this policy:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)
 - Act CXII of 2011 on Informational Self-Determination and Freedom of Information
 - Act CVIII of 2001 on Electronic Commerce Services
 - Act C of 2003 on Electronic Communications
 - Act XLVIII of 2008 on Business Advertising
 - Act C of 2000 on Accounting
 - Act CL of 2017 on the Rules of Taxation
 - Act V of 2013 on the Civil Code
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Data Processing for Contact Purposes

Visitors may contact us through any of the contact details available on our website or by using the contact form provided.

Personal data provided during contact will only be used for communication with the data subject and will not be transferred to third parties.

Purpose of data processing:

Contacting interested parties and responding to inquiries.

Legal basis for data processing:

Voluntary consent of the data subject pursuant to the General Data Protection Regulation (GDPR) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

Categories of processed data:

When sending a message through the contact form:

- name
- email address
- phone number

If contact is initiated through other channels, the following voluntarily provided data may be processed:

- name
- email address
- phone number
- postal address

Duration of data processing

Personal data provided during contact will be processed depending on the nature of the inquiry.

After providing the requested information, the data will not be stored further, unless a legal claim may arise from the communication. In such case, the data may be retained for a maximum of **5 years** for evidentiary purposes.

Data Processing Related to Information Requests and Quotations

The company provides the opportunity for third parties to request information or quotations regarding its services and products.

Purpose of data processing in case of quotation request:

Providing quotations and maintaining communication.

Purpose of data processing in case of information request:

Identification and communication.

Legal basis of data processing:

- consent of the data subject (GDPR Article 6(1)(a))

- processing necessary for taking steps prior to entering into a contract (GDPR Article 6(1)(b))

Data subjects:

Natural persons requesting information or quotations about the company's services or products.

Categories of processed data:

- name
- address
- phone number
- email address
- payment method

Persons authorised to access the data:

- company management
- employees responsible for customer relations

Duration of data processing

- successful quotation → until completion of the contract
- rejected quotation → until the rejection date
- unanswered quotation → until the expiry of the offer validity period
- information request → maximum **30 days after case closure**

Direct Marketing Activities

The personal data of individuals who have consented to direct marketing communications are processed by the Data Controller and its marketing partner:

RPM System Kft.

1141 Budapest, Szugló u. 82.

Tax number: 23377404-2-42

Email: info@brandin.hu

Purpose of processing

- building a marketing database
- sending newsletters and marketing emails
- creating personalised offers based on online analytics

The Data Controller may send offers related to its own products and services or those of its partners.

Legal basis of processing

The voluntary and explicit consent of the data subject (GDPR Article 6(1)(a)).

Only persons **over the age of 16** may provide consent for direct marketing.

Categories of processed data

- name
- email address
- phone number
- address (if provided)
- date of birth (if provided)
- technical data related to newsletter delivery and interaction (open rate, click statistics)

Duration of data processing

Until the withdrawal of consent or unsubscribing from the newsletter.

Withdrawal of consent

The data subject may withdraw consent at any time free of charge:

- through the unsubscribe link in the newsletter

- by sending an email to the Data Controller

Withdrawal does not affect the legality of previous data processing.

Role of the data processor

RPM System Kft. performs marketing activities on behalf of the Data Controller according to its instructions and does not transfer the data to third parties.

Photo and Video Recording

Purpose of processing

Promoting the Data Controller through social media platforms.

Categories of processed data

- image
- name
- phone number
- email address

Legal basis

Consent of the data subject
(GDPR Article 6(1)(a)).

Source of data

Commissioned photographer.

Duration of data processing

Until withdrawal of consent.

Data transfer

No data transfer occurs.

Social Media Platforms

The Data Controller operates profiles on the following platforms:

- Facebook
- Instagram
- LinkedIn
- YouTube

Purpose of data processing

Sharing and promoting products, services, events and news, as well as communicating with interested users.

Legal basis

Voluntary consent of the data subject
(GDPR Article 6(1)(a)).

Categories of processed data

Public profile data available on social media platforms, including:

- name
- profile picture
- publicly shared information
- interactions such as likes, comments, shares or messages

Data subjects

Any registered user of Facebook, Instagram, LinkedIn or YouTube who interacts with the Data Controller's pages.

Duration of processing

Data processing is governed by the rules of the respective social media platforms.

Data controllers

The platform operators may act as joint data controllers:

- Meta Platforms Inc.

- LinkedIn Ireland Unlimited Company
- Google Ireland Ltd.

Privacy policies:

Facebook / Instagram

<https://www.facebook.com/privacy/policy>

LinkedIn

<https://www.linkedin.com/legal/privacy-policy>

YouTube

<https://policies.google.com/privacy>

Chatbot

Purpose of data processing

- marketing (direct business acquisition) purposes
- providing a question-and-answer communication function

Categories of processed data

- first and last name provided to Facebook Messenger
- gender
- Messenger identifier
- email address
- phone number
- questions and answers
- message content

Legal basis of processing

Consent of the data subject

(GDPR Article 6(1)(a)), which is given when the user starts using the chatbot function.

Source of data

The data subject.

Duration of data processing

Until the user unsubscribes from the chatbot service, but **maximum 1 year**.

Data transfer

Data may be transferred to:

- Facebook Inc.
- Manychat Inc. (chatbot service provider)

These transfers may involve **third countries outside the European Union**.

Google Analytics

Our website uses **Google Analytics**, a web analytics service provided by Google.

Google Analytics uses cookies to collect information about how visitors use the website and generates statistical reports for the website operator regarding website usage.

On behalf of the website operator, Google uses this information to evaluate how users use the website and to compile reports on website activity. These reports help the website operator improve the operation of the website and enhance the user experience.

The information collected through Google Analytics is stored on Google's servers in encrypted form to ensure the security of the data and to prevent misuse.

Legal basis for data processing

The legal basis for processing data through Google Analytics is the **consent of the data subject** (Article 6(1)(a) of the GDPR), which is provided by the visitor via the cookie consent banner displayed on the website.

Purpose of data processing

- analysing website usage
- compiling statistical reports
- improving the performance and usability of the website

The information collected by Google Analytics does not allow the direct identification of individual users.

Disabling Google Analytics

Users who do not want Google Analytics to collect data about them can install the **Google Analytics Opt-out Browser Add-on**.

This browser add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics.

<https://support.google.com/analytics/answer/6004245>

Google Privacy Policy

More information about Google's data protection practices can be found here:

<https://policies.google.com/privacy>

Detailed privacy documentation:

https://static.googleusercontent.com/media/www.google.com/en//intl/hu/policies/privacy/google_privacy_policy_hu.pdf

Visitor Data Processing – Cookies

Visitors of the website are informed about the use of cookies and their consent is requested through a cookie consent banner displayed on the website.

During the use of the website, cookies may collect information such as:

- IP address
- browser type
- operating system
- language settings
- time of visit
- visited pages
- clicks and interactions

Purpose of data processing

- ensuring the proper functioning of the website
- improving website usability
- increasing service efficiency
- improving user experience
- analysing website usage
- displaying relevant advertisements

Legal basis

The legal basis for the use of cookies that are not strictly necessary for the operation of the website is the **voluntary consent of the visitor** (Article 6(1)(a) GDPR), given through the cookie consent banner displayed on the website.

Visitors may accept or reject cookies through the options provided in the cookie consent interface.

Please note that if cookies are rejected, certain functions of the website may not operate properly.

Types of Cookies

1. Essential Cookies

These cookies are necessary for the basic functioning of the website. Without them the website may not function properly.

Cookie	Provider	Type	Storage duration
pll_language	adiabatikus-hutes.hu / Polylang	necessary	1 year
VISITOR_PRIVACY_METADATA	YouTube / Google	necessary	6 months

2. Statistical Cookies

These cookies help us analyse how visitors use the website and improve the user experience.

Cookie	Provider	Type	Storage duration
_ga	Google Analytics	statistical	1 year 1 month 4 days
ga*	Google Analytics	statistical	1 year 1 month 4 days

Cookie Provider	Type	Storage duration
YSC YouTube	statistical	session

3. Marketing Cookies

These cookies allow advertisements to be displayed that are more relevant to the visitor.

Cookie	Provider	Type	Storage duration
_gcl_au	Google Ads / Tag Manager	marketing	3 months
__Secure-YNID	Google / YouTube	marketing	6 months
__Secure-ROLLOUT_TOKEN	Google / YouTube	marketing	6 months
yt.innertube::nextId	YouTube	marketing	no expiry
yt.innertube::requests	YouTube	marketing	no expiry

Website Server Logging

When visiting the website, the web server automatically logs certain user activities.

Purpose of data processing

The purpose of processing log data is to monitor the proper functioning of the website, ensure system security, and prevent misuse or unauthorized access.

Legal basis

The legal basis for this processing is the **legitimate interest of the Data Controller** in accordance with **Article 6(1)(f) of the GDPR**, which includes ensuring the secure and reliable operation of the website and investigating potential security incidents.

Categories of processed data

- identification number
- date and time of the visit
- IP address of the visited page
- IP address of the user's device
- IP address of the previously visited page
- operating system information

Duration of storage

Log data are stored for **90 days from the date of the visit**.

Data processor

DotRoll Kft.

1148 Budapest, Fogarasi út 3-5.

Data Processor	Address	Task
DotRoll Kft.	1148 Budapest, Fogarasi út 3-5	Web hosting
DotRoll Kft.	1148 Budapest, Fogarasi út 3-5	Website operation and maintenance

Legal basis of data transfer

Processing necessary for the performance of a contract (GDPR Article 6(1)(b)).

Hosting Provider

Company name: DotRoll Kft.

Registered office: 1148 Budapest, Fogarasi út 3-5., Hungary

Tax number: 13962982-2-42

Phone: +36 1 432 3232

Email: support@dotroll.com

The personal data provided by users are stored on servers operated by the hosting provider.

Access to the stored data is limited to the employees of the Data Controller and to the technical staff responsible for operating the servers. All persons involved are obligated to ensure the secure handling of personal data.

Activity

Web hosting and server services.

Purpose of processing

Ensuring the proper and secure operation of the website.

Categories of processed data

Personal data provided by the data subject during the use of the website.

Legal basis

Processing is necessary for the **performance of a contract** and for the **legitimate interests of the Data Controller** related to operating the website (GDPR Article 6(1)(b) and 6(1)(f)).

Duration of processing

Personal data are processed for as long as necessary for the operation of the website or in accordance with the contractual agreement between the website operator and the hosting provider.

Proof of Consent

During registration, ordering or subscribing to newsletters, the IT system records information related to consent in order to ensure proof of consent later if required.

Categories of processed data

- time of consent
- IP address of the data subject

Legal basis

Obligation under **GDPR Article 7(1)**.

Duration of processing

Consent data must be stored until the limitation period following the termination of the data processing.

Data Security Measures

The Data Controller ensures data security proportionate to the risks and takes technical and organisational measures necessary to enforce the provisions of the GDPR, the Hungarian Information Act and other data protection regulations.

The Data Controller protects personal data particularly against:

- unauthorized access
- alteration
- disclosure
- deletion
- destruction
- accidental loss or damage.

Personal data are stored in **password-protected and/or encrypted databases**.

Protection measures include:

- firewalls
- antivirus software
- encryption mechanisms
- content filtering
- additional technical and procedural safeguards.

Paper-based documents containing personal data are stored in locked rooms with fire and asset protection.

Documents requiring retention are archived in secure storage facilities.

Rights of Data Subjects

The data subject may request:

- information about the processing of personal data
- correction of personal data
- deletion of personal data
- restriction of processing
- data portability
- objection to processing.

Requests may be submitted using the contact details of the Data Controller.

Information will be provided **without undue delay, but within 30 days at the latest.**

All requests are handled **free of charge.**

Right to Information

The Data Controller shall provide all information required under **Articles 13–14 and Articles 15–22 and 34 of the GDPR** in a concise, transparent, intelligible and easily accessible form.

Information may be requested in writing via the provided contact details.

Identity verification may be required before providing information.

Right of Access

The data subject has the right to obtain confirmation whether personal data concerning them are being processed.

If processing takes place, the data subject has the right to access:

- purposes of processing
 - categories of personal data
 - recipients of the data
 - storage period
 - right to rectification or deletion
 - right to lodge a complaint
 - source of the data
 - existence of automated decision making.
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Right to Rectification

The data subject has the right to request the correction of inaccurate personal data and the completion of incomplete data.

Right to Erasure ("Right to be Forgotten")

The data subject has the right to request deletion of personal data if:

- the data are no longer necessary
- consent has been withdrawn
- the data subject objects to processing

- the processing is unlawful
- deletion is required by law.

Deletion cannot be requested where processing is necessary for:

- freedom of expression
 - legal obligations
 - public interest
 - legal claims.
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Right to Restriction of Processing

The data subject may request restriction of processing if:

- the accuracy of the data is contested
 - the processing is unlawful but deletion is not requested
 - the controller no longer needs the data but the data subject requires them for legal claims
 - the data subject has objected to processing.
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Right to Data Portability

The data subject may request that personal data be provided in a structured, commonly used, machine-readable format.

The Data Controller can provide data in **Word or Excel format**.

Right to Object

If personal data are processed for **direct marketing purposes**, the data subject has the right to object at any time.

Upon objection, personal data shall no longer be processed for marketing purposes.

Automated Decision-Making

The data subject has the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning them.

This right does not apply where processing:

- is necessary for a contract
 - is authorised by law
 - is based on explicit consent.
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Withdrawal of Consent

The data subject has the right to withdraw consent **at any time**.

Withdrawal does not affect the lawfulness of processing prior to withdrawal.

Compensation and Damages

Any person who has suffered material or non-material damage as a result of a violation of the GDPR has the right to receive compensation from the data controller or processor.

If several controllers or processors are involved, they shall be **jointly liable** for the damage.

Legal Remedies

Before initiating legal proceedings, it is advisable to contact the Data Controller so that the issue can be resolved.

If unlawful data processing is suspected, the data subject may initiate civil proceedings before the competent court.

Supervisory Authority

National Authority for Data Protection and Freedom of Information (NAIH)

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