



DATA PROTECTION

1. The persona and contact information of the data manager

Taste Loffice Kft. (seat: 1061 Budapest, Paulay Ede u. 55.; registration number: 01-09-209834; contact person regarding data protection issues: Kata Klementz manager; email address and telephone number of the contact person: kata.klementz@loffice.hu, +36703186356, hereinafter: **Loffice**) acts as data manager regarding the data of current, previous and future clients.

2. Regulations acting as basis of data management

- 2011./CXII. Regulation on information self-determination and freedom of information
- 2016/679/EU Regulation on personal data protection of natural persons and flow of such information and repealing of regulation 95/46/EK (general data protection regulation)

3. Definitions

client: those who have shown interest in the products and services of Loffice personally, online, on the telephone or in any other way, as well those in contract with Loffice.

data manager: the natural or legal person, public authority, agency or any other organisation which defines the aims and tools of the management of personal data independently or with others; the aims and tools of data management are defined by European Union or member governmental law, the person of the data manager and the special criteria regarding the assignment of the data manager can be defined by both union and member governmental law;

data management: the sum of automated or non-automated operations regarding personal data or data bases, such as collection, recording, systemization, division, storing, conversion or modification, query, introspection, utilization, publication, transmission, dissemination or providing access by any other methods, synchronization or attachment, regulation, deletion and annulment;

data processor: the natural or legal person, public authority, agency or any other organisation which manages personal data on behalf of the data manager;

GDPR: the 2016/679 REGULATION (27 April 2016) of the EUROPEAN PARLIAMENT AND COUNCIL regarding personal data protection of natural persons and flow of such information and repeal of policy 95/46/EK;

supervisory authority or NAIH: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority of Data Protection and Freedom of Information);

special categories of personal data: racial or ethnic ancestry, personal data reflecting on political, religious or ideological belief or trade-union membership, also genetic and biometric data intended for the unique identification of natural persons, healthcare data and personal data regarding the sexual orientation and life of the natural persons,

4. Principles of data management

Loffice makes adequate provisions to provide the following regarding the personal data of clients at all times:

- (a) data management on a legitimate, fair and adequate legal basis (legality, fair procedure and transparency);
- (b) data collection for a definite, unequivocal and legitimate purpose;
- (c) adequate, relevant and strictly as-needed data management for the intended purpose of the data collection (data efficiency);
- (d) to be accurate and, if requested, to be up-to-date; the deletion or correction of the inaccurate personal data if possible (accuracy);

(e) Loffice stores data in a form that allows the identification of clients only for a time that is necessary for the purpose of the personal data management;

(f) Loffice manages data in a form that provides protection for personal data by adequate technical and management measures including protection against illegal or unauthorized usage of data and its unintended loss, deletion or damage (integrity and confidentiality).

5. The data managed by Loffice, the purpose, legal basis and duration of data management

I. Inquiry about services online, in person, on phone or by other means

a) Name;	Indispensable data for the identification of the client.
b) Email address (telephone number);	Indispensable data for further correspondence with the client.
c) Subject of inquiry (e.g. coworking, office, meeting room, event space, headquarters address);	Data required for the clarification of the inquiry by the client and its proper, personalized answering, provided by the client.

The legal basis of the data management is the consent of the client. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

II. Newsletter subscription

a) Name;	Indispensable data for the identification of the client.
b) Email address (telephone number);	Indispensable data for further contact with the client.
c) Subject of inquiry (if applicable);	Data required for the clarification of the newsletter/eDM, provided by the client.

The legal basis of the data management is the consent of the client. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

III. Individual inquiry

a) Name;	Indispensable data for the identification of the client.
b) Email address (telephone number);	Indispensable data for further connection with the client.
c) Subject of inquiry (e.g. coworking, office, meeting room, event space, headquarters address);	Data required for the clarification of the inquiry by the client and its proper, personalized answering, provided by the client.

The legal basis of the data management is the consent of the client. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

IV. Contracting

a) Name;	Indispensable data for the identification of the client.
b) Email address (telephone number);	Indispensable data for further contact with the client.
c) Subject of contract (e.g. coworking, office, meeting room, event space, headquarters address);	Data required for the definition of the subject of the contract.

The legal basis of the data management is the compliance of the contract and the arrangement of the concerned legal disputes. Duration of the data management is the term of the contract plus five years (term of general civil rights claim validation).

V. Sale of event tickets

a) Name;	Indispensable data for the identification of the client.
b) Email address (telephone number);	Indispensable data for further contact with the client.
c) Subject of contract;	Data required for the definition of the subject of the contract.



The legal basis of the data management is the compliance of the contract and the arrangement of the concerned legal disputes. Duration of the data management is the term of the contract plus five years (term of general civil rights claim validation).

VI. Profiling

a) Sum of the data collected regarding the activities in I – IV.	Data required for the identification of the client and sending personalized offers with the prior consent of the client.
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The legal basis of the data management is the express consent of the client to profiling. Data management lasts for the duration indicated by client or until the withdrawal of the consent.

6. Addressee of personal data and categories of addressees

Loffice in general shares personal data of clients with the following third parties on a data manager to manager basis:

- (a) with Loffice group companies;
- (b) organizations providing services to Loffice or the clients (e.g. insurance company, IT provider, company providing marketing campaign, accountant);
- (c) third parties involved in the delivery of contract obligations (e.g. catering provider etc.);
- (d) supervisory and other regulatory authorities and organizations.

Clients can request from Loffice and Loffice is required to provide personalized information regarding the management of their data (purpose and legal basis of data management, the scope of data, the transmission of data, the duration of management, and the logic of profiling). It can be requested through the following contact points: office@loffice.hu, +36 70 318 6356, 55 Paulay Ede Street, Budapest 1061.

7. The client's rights to accessibility

The client has access to his/her personal data.

If the client requests Loffice to provide information about data management Loffice is obliged to provide information.

The client's right to information about the data management of Loffice

- (a) concerns his/her personal data;
- (b) does not concern anonymous data;
- (c) does not concern personal data of other clients and
- (d) concerns the aliased data clearly connected to the client.

Loffice by the request of the client provides accessibility to and a copy of the personal data. If the client requests further copies of the personal data, Loffice may charge a reasonable fee for covering administrative costs related to the request, which costs are to be paid by the client.

8. The client's right to correction

The client has the right to request correction of his/her personal data. This right

- (a) does not concern anonymous data;
- (b) concerns his/her personal data;
- (c) does not concern personal data of other clients and
- (d) concerns the aliased data clearly connected to the client.



Loffice corrects and complements personal data by request of the client. Loffice informs the addressees of the personal data (if there are any) about the correction. But Loffice does not inform the recipients about the correction of personal data if the information of the addressees seems impossible or requires a disproportionate amount of effort.

9. Clients' right to deletion

Under certain conditions client is entitled to request the deletion of his/her personal data.

Loffice is obliged to delete the client's personal data without unwarranted delay if

- (a) Loffice manages the personal data and
- (b) client requests the deletion of the personal data and
- (c) the data is not necessary for the purposes for which Loffice manages data.

Loffice is obliged to delete the client's personal data without unwarranted delay if

- (d) Loffice manages the personal data and
- (e) client requests the deletion of the personal data and
- (f) the client withdraws the consent on which management is based and
- (g) there is no further legal basis for the management of the client's personal data.

Loffice is obliged to delete the client's personal data without unwarranted delay if

- (h) data management is required for the validation of the rightful interests of Loffice or a third party and
- (i) client objects to the data management of Loffice and
- (j) no lawful reason for the management of such data has precedence against the objection of the client.

Loffice is obliged to delete the client's personal data without unwarranted delay if

- (k) client requests the deletion of the personal data and
- (l) the management of such data by Loffice is not illegal and
- (m) deletion of the data is obligatory according to laws in force and
- (n) data of the client is collected regarding the services of the information society.

Loffice informs the addressees of the personal data (if there are any) about the correction. But Loffice does not inform the addressees about the correction of personal data if the information of the addressees seems impossible or requires a disproportionate amount of effort.

10. Clients' right to the restriction of data management

The client may request the restriction of the management of his/her personal data.

The client's right to the restriction of data management

- (a) does not concern anonymous data;
- (b) concerns his/her personal data;
- (c) does not concern personal data of other clients and
- (d) concerns the aliased data clearly connected to the client.

Loffice restricts the management of the client's personal data for the duration of the verification of such data if the client requests the restriction of data management and disputes the accuracy of such data.

Loffice restricts the management of the client's personal data if the client requests the restriction of data whose management is illegal and the client is against the deletion of such data.

Loffice restricts the management of the client's personal data if

- (a) the client requests restriction of the management of his/her personal data and
- (b) Loffice has no use for these data for the purpose of data management and
- (c) client requires his/her data for the submission, validation or protection of a legal claim.

Loffice restricts the management of the client's personal data if

- (a) the client objects to the management of such data that are necessary for the purpose of Loffice's interests and

(b) the client awaits confirmation that the management of the personal data by Loffice has a justified cause which does not have precedence against the objection of the client.

Loffice informs the addressees of the personal data (if there are any) about the restriction. But Loffice does not inform the addressees about the restriction of personal data management if the information of the addressees seems impossible or requires disproportionately too much effort.

If Loffice restricts the management of the client's personal data, Loffice can

- (a) store the personal data;
- (b) manage the data by the consent of the client;
- (c) manage the personal data for the submission, validation or protection of a legal claim, or for the protection of a person's rights.

Loffice is not permitted to use client data for direct business acquisition, including profiling and automated decision making in individual causes.

11. The client's right to data portability

Client is entitled to receive the his/her personal data provided to a data manager in a divided, widely used, computer compatible format. Client is further entitled to transmit the personal data to another data manager without any restriction regarding the receiving data manager if the data management is based on consent or it is necessary for the fulfillment of a contract and the data management is arranged in an automated manner.

The client's right to data portability

- (a) does not concern anonymous data;
- (b) concerns his/her personal data;
- (c) does not concern personal data of other clients and
- (d) does not concern the aliased data clearly connected to the client.

12. Cookie policy

The lofficecoworking.com portal contains references arriving from an external server unrelated to Loffice and references referring an external server unrelated to Loffice. The server of the external provider is in direct connection with the computer of the user. We inform our visitors that the providers of these references may collect user data (IP address, data of the operating system, movement of cursor, and address of the visited page and the time of visit) due to direct connection to their servers and communication with the user's browser.

IP address is a digit sequence with which the computers of the users connecting to the internet can be clearly identified. With the help of the IP address the users of the computers can be located geographically. The address of the visited sites and time data are not sufficient on their own for identifying users. But in combination with other data (e.g. provided during registration) conclusions related to the users may be made.

The external providers reachable on the following links may place small data packages (cookies) on the users' computer, collect their IP address and other data, and display them marketing content:

Purpose	Name	Link to the data management policy
analytic metering	Google Analytics	http://www.google.com/intl/hu/policies/
newsletter provide	Webstation	http://www.wst.hu/
social media page	Facebook	https://www.facebook.com/privacy/
social video-sharing page	Youtube	https://policies.google.com/privacy?hl=hu



Data managers provide further information about their data management policies at the links above.

Users can delete cookies from their computers and can block the usage of cookies in their browsers. The management of cookies usually can be done in the Tools/Settings menu of browsers, under the Data protection/Browser history/Personal settings menu under the section cookies or tracking.

For further information about cookies visit this website: <http://www.adatvedelmiszakerto.hu/cookie>

13. Deadline for submitting the customer's request

Loffice answers the client's requests regarding the permissions above with the following deadlines:

Request	Deadline
Right to information	when the data is collected (if the client shares data) or within one month (if the client does not share data)
Right to accessibility	one month
Right to correction	one month
Right to deletion	without unwarranted delay
Right to restriction of data management	without unwarranted delay
Right to data portability	one month
Right to objection	at the receipt of objection

14. Right to submission of complaints

If the client claims that his/her rights were violated, Loffice recommends initiating a discussion with the data manager by contacting the contact person indicated above. If such discussion does not lead to conclusion or the concerned person does not wish to take part in such activity, he/she can turn to court or the NAIH (*Hungarian National Authority for Data Protection and Freedom of Information*). When initiating a judicial proceeding, the person concerned may bring it to the competent court for his/her residency or home address.

Contact information of NAIH: Szilágyi Erzsébet fasor 22/C., Budapest 1125; Telephone: +36 1 391 1400; fax: +36 1 391 1410; email: ugyfelszolgalat@naih.hu; website: www.naih.hu.

Regarding the provided and lawfully managed data, and the restriction and prohibition of the usage and management of the data, Loffice undertakes no liability for compensation.

15. Modifications of the present information

Loffice reserves the right to modify the information in this Data Protection Policy at anytime. In case of such modification, Loffice will inform clients by email regarding the relevant changes.