Privacy Policy

1. Identification of controller

We inform you that the website https://www.flexicarrent.hu/ is run by

Flexi-Car Rent Korlátolt Felelősségű Társaság

Short name: Flexi-Car Rent Kft.
Registration number: 01-09-350382 Company Registry Court of Budapest-Capital Regional Court (Fővárosi Törvényszék Cégbírósága)
Tax number: 27117879-2-41
Headquarters: 37 Váci Road Budapest 1044, Hungary
Place of business: 37 Váci Road Budapest 1044, Hungary
Telephone: +36705333175
E-mail address: info@flexicar.hu

(Controller hereafter)

2. Legal requirements concerning processing, scope of present policy

2.1. Controller primarily handles Users data in accordance with
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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),
- The EU General Data Protection Regulation (GDPR hereafter)
- and also Regulation CVIII of 2001 on Electronic commercial services and services related to some aspects of information society (Ekertv.)

2.2. Present policy applies to processing done during the usage of the website http://www.flexicarrent.hu/ (website hereafter), drawing on services offered there, as well as fulfilling orders on the website.

2.3. Based on present Policy, Users are: natural persons browsing the website and drawing on services of the website, and natural persons ordering from Controller

3. Legal bases of processing

3.1. Legal basis of processing done by Controller lies upon GDPR Article 6, Paragraph (1), Point a) about consent of User to processing, and Article 6, Paragraph 1, Point b) of GDPR, which states that processing is necessary for fulfillment of contracts in which User is one of the parties. Furthermore, GDPR Article 6, Paragraph (1), Point c) which says that data management is necessary to fulfill Controller's legal obligations.

3.2. In case of processing based on given consent, User previously agrees to processing by marking an indicator box above processing agreement placed at relevant places. User can read about processing anytime under "Privacy Policy" appearing at every page of the website, or by clicking on "Privacy Policy" link in processing agreement mentioned in this point, through which Controller provides User in advance with obvious and detailed information. By marking the indicator box above mentioned processing agreement, Users declare that they have read Privacy Policy and consent to handling their data in accordance with present Policy knowing its content.

3.3. In certain cases, Controller is required to do some processing actions, or its rightful interest might be the legal basis to process data. User can read about these in more detailed below, in chapters about each case of processing.

4. Data management related to the operation of an information technology service

4.1. Controller uses 'cookies' to run the website and to collect technical data about the visitors of the website.

4.2. Controller represent a specific reference for visitors of the website: 'Information about the use of cookies'

5. Data management related to receiving and answering messages

5.1. Concerned parties in processing: Users who have used the messaging surface that can be reached under 'CONTACT' on the website or by sending an e-mail to Controller using the e-mail address(es) appeared on the website.

5.2. Legal basis for processing: User's consent according to GDPR Article 6, Paragraph (1), Point a).

5.3. Determining the scope of data handled:

The following data of User who sent an e-mail
- name
- e-mail address
- telephone number
- other possible data that was given in a message sent by User

As for any other data that has been sent by Users, Controller handles information concerning received messages from Users only content wise, and does not require Users to give personal data within. When such non-required information is provided though, they are not stored and Controller deletes them immediately from the information technology system.

5.4. Purpose of data management: to ensure exchange of messages between Controller and User.

Services involved:
- writing messages at the website,
- receiving e-mail messages (by using e-mail address(es) on the website),
- replying messages that have been sent to Controller the above mentioned ways within 2 working days.

The telephone number becomes necessary only if Users' question raised in the message is complex and it is expedient to answer it on the phone.

5.5. Duration of data management: until answering a request or accomplishing a claim. Afterwards, Controller deletes data that is handled for these purposes. If there are more exchanges of messages, data are erased after the claim has been accomplished.

If contracting occurs during the process of exchange messages, and content of messages is important with regard to the contract, legal basis and period of processing happens based on Point 7. ('Data management related to orders')

5.6. Method of data storage: on separate data managing lists in the information technology system of Controller.

6. Data management related to registration

6.1. Scope of concerned parties: Users registering at website.

6.2.Legal basis of processing: based on GDPR Article 6, Paragraph (1), Point a), User's consent. Voluntary consent is given by clicking 'Yes' under 'Create account' during the process of ordering as well as clicking at the indicator box in front of Privacy information notice.

6.3. Scope of handled data:
- name,
- e-mail address,
- password.

Goal of processing: to simplify registration and frequent rental at website.
Services connected to this:
- creating a personal account for the User,
- simplifying online ordering of vehicle by storing data necessary for accomplishing order, or enabling User to modify these data independently,
- storing previous orders and enable Users to access them in the User'saccount.

6.4. Duration of processing: As for registered Users, duration of processing lasts until Users request for data deletion. Processing may finish when User deletes their registration or when Controller deletes User's registration. User may delete their

registration anytime, or can ask Controller to do so. Such incoming requests are handled and accomplished immediately, but within no more than 10 working days after the request arrives .

6.5. Method of storing data: on a separate processing list within Controller's information technology system.

7. Data management related to orders

7.1. Scope of concerned parties: Users who have make an order at the website.

7.2. Legal basis of processing: based on GDPR Article 6, Paragraph (1), Point b), according to which processing is necessary to accomplishing contracts where User is one of the parties, for Users' place and date of birth and for address, GDPR Article 6, Paragraph (1), Point c) says that data management is necessary to fulfill Controller's legal obligations.

7.3. Scope of handled data: Data management involves the following personal data and contacts.
Users who are making an order:
- surname,
- first name,
- place and date of birth,
- address,
- invoicing name (if it is different),
- invoicing address (if it is different)
- telephone number
- e-mail address
- identification of the ordered vehicle - and of possible accessories if they have been asked for
- rental fee of ordered vehicle - and of possible accessories if they have been asked for
- location of takeover
- location of return
- payment method
- other information User might have provided in order to accomplish the order
- time of order
- time of payment

In case of online payment, data of the bank card that was used for payment is not revealed to Controller, as User provides payment service provider directly with such data.

7.4. Goal of data management: to fulfill contract based on ordering, as for the User's name, place and date of birth, the goal of data management is to fulfill Controller's legal obligations. Controller is obliged to record such data based on §21/A of Act I of 1988 on Road Traffic and also §1 of Government Decree 410/2007 (XII.29.) on 'scope of road-traffic violation to fine administrative fee, the amount of fine for violating provisions

applying to these activities, on the use of them and on the conditions of the involvement in controlling.

7.5. Duration of processing: above mentioned data - except place and date of birth - that is processed to fulfill the order is handled by Controller until they are necessary to fulfill the obligation to keep sales notes. This period lasts at least 8 years after billing a sale note according to Act on Accounting (Számviteli törvény), after passing this deadline, Controller deletes data within one year. In relation to the recorded data that is necessary to fulfill the above legal obligation (the User's name, place and date of birth, address - Controller process data until the date when road-traffic violation to fine administrative fee period lapse which means two years after returning the car to Controller.

Other data possibly processed during ordering – e.g. important messages between User and Controller about orders – are processed by Controller for 5 years after contracting – general term of limitation concerning civil demands.

7.6. Method of data storage: On separate processing list within the Controller's information technology system, as well as a paper-based contract and on accounting documents (prepayment requests, bills) that correspond to related laws about keeping bills for certain periods of time.

8. Data management concerning refunds

8.1. In case of money refund when User paid by credit card or by any other online payment ways through paying services User can get back the paid amount of money through the given means of payment or paying service that was originally used. In case User paid by bank transfer or asks refund this way then Controller pays back the amount of money by bank transfer.

8.2. Scope of parties concerned: User who placed the order and affected by money refund

8.3. Legal basis of processing: according to GDPR Article 6 paragraph 1, point (c) in compliance with legal obligation of the Controller.

8.4. Scope of data handled:
- order ID,
- the sum to be refunded,
- legal title of refund,
- User's name,
- bank account number in case User paid by bank transfer or wants the money back by bank transfer.

8.5. Goal of processing: in case it is on a warranty, a right of withdrawal or a guarantee proceeding, the goal is to fulfil their duty in accordance with A'ct V of 2013 on the Civil Code (Polgári Törvénykönyvről szóló 2013. évi V. törvény)', 'Government Decree 45/2014 (II 26) Article 23, Paragraph 1 on Detailed Rules of Contracts between Customers and

Business (a fogyasztó és a vállalkozás közötti szerződések részletes szabályairól szóló 45/2014. (II. 26.) Korm. rendelet)' or 'Government Decree 151/2003. (IX.22.) Article 5, Paragraph 5,6,7 on compulsary warranty on certain consumer durables' (az egyes tartós fogyasztási cikkekre vonatkozó kötelező jótállásról szóló 151/2003. (IX. 22.) Korm. rendelet 5. § (5), (6), illetve (7) bekezdés)' depending on the legal title.

8.6. Duration of processing: in order to refund, Controller handles information mentioned above until it is prescribed by the Act on Accounting (Számviteli Törvény) about keeping certificates. According to the Act on Accounting (Számviteli Törvény), this period is at least 8 years after making out an invoice, after passing this deadline, Controller deletes data within one year. The circle of handled data is mainly data which is included in the sales notname, address, data relating to product concerned with refund, the sum to be refunded).

Other data - that are not subject to the accounting documents - possibly processed during ordering (e.g. important messages between User and Controller about orders) is processed by Controller for 5 years after contracting – general term of limitation concerning civil demands. The interruption of the limitation period shall prolong the processing period until the new date of limitation.

8.7. Method of data storage: on a list of data-processing kept separately on Controller's IT system and also data that is necessary for maintaining proper accounting is kept on accounting documents in order to fulfil its obligation of retention of supporting documents provided by Accounting Act

9. GPS related data management

9.1. Scope of concerned parties: Users who are renting a vehicle at the website and those who are named to also drive the car by Users.

9.2. Legal basis of data management: based on GDPR Article 6, Paragraph (1), Point f) it is Controller's legitimate interest. Controller has made a document about considering its interests which can be reached at Controller's.

9.3. Scope of processed data: Users who are renting a vehicle, and also if User uses a driver/drivers, data management relates to the following data and contact.

Data: the route of the rented vehicle thereby the User's or the hired driver's
route, so the rented vehicle's:
- geographical situation, route,
- current speed and maximum speed,
- fuel level, consumption,
- condition of the ignition switch.

9.4. Purpose of data management: to locate the geographical situation of the rented car so that Provider would be able to successfully retrieve its valuable vehicles or values owned by Provider or its partners.

9.5. Period of data management: Activating the system and defining the vehicles location and the above mentioned data will happen only if circumstances make it necessary. Storing such data will only happen if Controller's or a third party's interest requires it, in this case storing data happens as long as legal purpose justifies it.

9.6. Method of data management: On separate processing list within the Controller's information technology system.

10. Forwarding data

10.1. Scope of concerned: Users choosing online payment during purchasing on the website, regardless of using other services.

10.2. Addressee of data forwarding:

Barion Payment Inc.

Registration number: 01-10-048552
Tax number: 25353192-2-43
Place of establishment: 1 Infopark Lane (Door.5. Floor 5, Building 1) Budapest 1117, Hungary
Postal address: 1 Infopark Lane (Door.5. Floor 5, Building 1) Budapest 1117, Hungary
Telephone: +3614647099
E-mail address: adatvedelem@barion.com
Website: https://www.barion.com/hu/

Company as service provider of the online purchase service that can be used on Controller's website.

10.3. Legal basis of data forwarding: User's legitimate interest based on GDPR Article 6, Paragraph (1), Point a).

Recipient is obliged to run a fraud prevention and scout system in connection with offering payment services and has the right to handle personal data that is necessary for these. Recipient has developed its system regarding to legal obligations, for its operation data forwarding by Controller is necessary. Accordingly to this it is Recipient's legitimate interest to run a fraud prevention and scout system to meet its legal obligations. Recipient falls under the following provisions:
- Act CCXXXVII of 2013 165. § (5) Paragraph on Credit Institutions and Financial Enterprises (a hitelintézetekről és a pénzügyi vállalkozásokról szóló 2013. évi CCXXXVII. törvény 165. § (5) bekezdése),
- Act CCXXXV of 2013 92/A. § (3) Paragraph Point f) on some payment services (az egyes fizetési szolgáltatókról szóló 2013. évi CCXXXV. törvény 92/A. § (3) bekezdés f) pontja),
- Act LXXXV of 2009 14. § (1) Paragraph Point v) on providing payment services (a pénzforgalmi szolgáltatás nyújtásáról szóló 2009. évi LXXXV. törvény 14. § (1) bekezdés v) pontja).

Fraud prevention and providing proper operation of online services are both Controller's and Recipient's legitimate interest. Both organisations' main source of revenue connects to proper operation of payment services. Nevertheless these are User's interests as well, in particular to avoid abuse of bank card data.

Data forwarding allows preventing and detecting frauds and troubleshooting of possible stumbling block that might appears during the process of payment.

Forwarded data comes from User's data handled during booking/ordering and these data are forwarded through electronic channels which ensure encrypted data traffic solely for Recipient and only after payment is done and which are not used for any other purposes by Recipient. Therefore, data forwarding puts no significant risk on User , it has no other visible effect on them.

Forwarding data is necessary for reaching goals described here and is suitable for making payment services safer.

In view of the above and taking the built in guarantee operations into account, forwarding does not mean unreasonable degree encroachment into Users' personal lives, therefore data forwarding is a necessary and proportional data processing operation.

A separate documentation is made about the consideration of interests whose details can be required by User from Controller.

10.4. Scope of data forwarding:

- data that is necessary for the order transaction while renting a vehicle,
- surname,
- first name,
- telephone number,
- e-mail address,
- address,
- Unique identifier of the transaction.

Bank card data given during payment is directly provided for payment service provider, so Controller does not gain access to them.

10.5. Purpose of forwarding data: Operating and managing online payment service appropriately, confirmation of transactions, operating fraud-monitoring to protect users' interests. This is a system to reveal frauds related to online payment, supporting the control of bank transactions – and providing help through customer support service.

10.6. To learn more about Barion's data management and further circumstances of data management - among others plea of law, purpose, scope of handled data, duration of data management - please visit https://www.barion.com/hu/adatvedelmi-tajekoztato/ .

10.7. Controller does not forward information to third parties for business or marketing purposes.

10.8. Controller forwards information only to official bodies in accordance with legal requirements beyond the above mentioned cases.

11. Using data managers

Controller draws on the following businesses to process data.

11.1. Storage space service provider

11.1.1. Parties involved in data processing: Users visiting website, regardless of using services.

11.1.2. Controller uses

MEDIACENTER HUNGARY IT, Provider and Operator Limited Liability Company

Short name: MEDIACENTER HUNGARY Ltd.
Registration number: 03-09-114492
Tax number: 13922546-2-03
Headquarters: 5 Erkel Ferenc Street, Kecskemét 6000, Hungary
Postal address: 5 Erkel Ferenc Street, Kecskemét 6000, Hungary
Telephone:+36 76 575 023
Fax: +36 76 575 024
E-mail address: mediacenter@mediacenter.hu
Webpage: http://www.mediacenter.hu

as website storage place provider (Data Processor hereafter).

11.1.3. Defining the scope of data involved in data management: this relates to all information mentioned in present policy.

11.1.4. Purpose of data management: To ensure functioning of website in an information technological way for Users who are involved.

11.1.5. Period of data management: It correlates with processing periods indicated in this policy for processing with various objectives.

11.1.6. Processing data exclusively means to provide storage space necessary for the operation of website in an information technological way.

11.2. Website developer

11.2.1. Parties involved in data processing: Users visiting website, regardless of using any of its services.

11.2.2. Controller makes use of the following company as data manager

Exibio Service Limited Partnership (Exibio Szolgáltató Betéti Társaság)

Short name: Exibio Bt.
Registration number: 13-06-070108
Tax number: 21178058-1-13
Place of establishment: 1 Pilis Street, Nagykovácsi 2094 Hungary
Telephone: +36704560073
E-mail: info@exibio.hu
Website: https://exibio.hu

Company as the developer of the website (Controller hereafter)

11.2.3. Defining the scope of data involved in data management: this relates to all information mentioned in present policy.

11.2.4. Purpose of data management: To ensure the function of the website in an information technological way through data management that is expressed through necessary informational technology operations.

11.2.5. Period of data management: It is the same period as it has already been defined as data management periods at the separate sets of data for different data management purposes in present Policy.

11.2.6. Processing data exclusively means technical operations that are necessary for the operation of website in an information technological way

11.3. Data management related to giving invoices

11.3.1. Parties involved in data management: Users making an order on the website, regardless of using other services of the website.

11.3.2. Controller makes use of the following company as data manager

**NATURASOFT Hungary Limited Liability Company
(NATURASOFT Magyarország Korlátolt Felelősségű Társaság)**

Short name: NATURASOFT Hungary Ltd.
Registration number: 01-09-870298
Tax number: 13730934-2-43
Place of establishment: 77-79 Bocskai Road, Budapest 1113 Hungary
Telephone: +36 1 209 2152
E-mail: info@naturasoft.hu
Website: https://www.naturasoft.hu/

that has developed and operates the invoicing software that is used by Controller (Data manager hereafter)

11.3.3. Defining the scope of data involved in data management: data processing affects

the name and address of those who order and also the name of the ordered item(s) and/or service(s), time of renting, the renal fee and invoices about any other fees.

11.3.4. Purpose of data management: to ensure the operation of the softver on an information technological way that is necessary for giving invoices data management that is expressed through informational technology operations that is necessary for operating he software safely.

11.3.5. Period of data management: the obligation of keeping invoices comes from the Act of Accounting and it says invoices have to be kept for 8 years from the time of invoicing.

11.3.6. Data management exclusively covers only technical operations to manage software about making invoices on an information technological way.

11.4. Data management in relation with handing over the vehicle

11.4.1. Parties involved in data management: Users who are handing over and returning the rented vehicle at the establishment of Parkolo.com Bt., address is: 242 Main Road, Vecsés 2220 Hungary (2220 Vecsés, Fő út 242.)

11.4.2. Controller makes use of the following company as data manager

Parkolo.com Betéti Társaság

Short name: Parkolo.com Bt.
Registration number: 13-06-070669
Tax number: 26090915-1-13
Place of establishment: 12 Széchenyi Street, Ecser 2233 Hungary
Telephone: +36 20 345 7904
Website: https://parkolo.com/

To be the web hosting supplier (Data manager hereafter)

11.4.3. Defining the scope of data involved in data management: Data management involves the following personal data and contacts:

- surname,
-first name,
- place and time of birth,
- address,
-e-mail address,
- description of ordered vehicle(s) - and any requested accessories,
- rental fee of ordered vehicle(s) - and any requested accessories,
- method and place of handover/delivery,
- method of payment,
- any other information that was given by the User at the time of ordering and is necessary for fulfilling the order,

- time of order,
- time of payment.

11.4.4. Purpose of data management: to ensure the process of handing over and taking back the rented vehicle at Data manager's establishment.

11.4.5. Period of data management: It lasts until the time Data manager accounts to Controller after User returns the vehicle to Data manager.

11.4.6. Data management covers operations only which are necessary for handing over and taking back vehicles.

11.5. Data management related to GPS positioning

11.5.1. Parties involved in data management: Users who are renting a car at the website and those who also drive the car.

11.5.2. Controller makes use of the following company as data manager

ITware Informatikai Szolgáltató és Kereskedelmi Limited Liability Company

Sort name: ITware Ltd.
Registration number: 01-09-695178
Tax number: 12617029-2-43
Place of establishment: 3 Szent László Road, Martonvásár 2462 Hungary
Telephone: +36 30 207 3416; +36 30 477 6033
E-mail: info@fleetware.hu
Website: https://www.fleetware.hu/

As web hosting supplier (Data manager hereafter)

11.5.3. Defining the scope of data involved in data management: data management affects data in connection with the rented vehicle's (therefore the User's and/or replacement driver's) location, speed, route.

11.5.4. Purpose of making use of a data manager: to locate the geographical situation of the rented car so that Provider would be able to successfully retrieve its valuable vehicles or values owned by Provider or its partners in case if misuse.

11.5.5. Period of data management: Activating the system and defining the vehicles location and the above mentioned data will happen only if circumstances make it necessary. Storing such data will only happen if Controller's or a third party's interest requires it, in this case storing data happens as long as legal purpose justifies it.

11.5.6. Type and method of data management: Data management covers only storing the rented vehicle's geographical location, route and speed on the IT system.

11.6. Data management does not serve any other purposes.

11.7. Controller does not make use of any other data managers.

12. User's rights concerning data processing

12.1. **Right to access**: Controller gives information for User's request about data being handled by itself and by Data Processor, their sources, goals of data processing, its legal basis, period, name and address of Data Processor, its activities related to data processing, consequences and effects of a possible data protection incident and actions done in order to avoid such cases, furthermore, in case of forwarding concerned person's personal data, about the legal basis and addressee of data forwarding. Controller provides information without any unreasonable delay, within maximum one month after the arrival of the request.

Within the framework of the right to access, Controller provides User with a **copy** of personal data involved in processing, within maximum one month after the arrival of the request. For further demands from User, Controller calculates a reasonable fee based on administrative costs (see Chapter 13).

12.2. **Right to portability of data**: Users have the right to get personal data about themselves in an articulate, widely used format, readable on devices, furthermore, have the right to forward these pieces of information to another Controller without the obstruction of Controller that has User's data according to User's consent, if:
a) processing is based on User's consent or contract; and
b) processing is automatized.

Practising the right to portability of data, User has the right – if it is technically practicable – to ask Controllers to forward information between each other directly.

12.3. **Right to correction**: User has the right to ask for correction of their data, which Controller fulfills without any unreasonable delay, within maximum one month after the arrival of the request. Considering the goal of processing, User has the right to ask for completing their missing personal data – for example through an additional declaration.

12.4. **Right to limitation of processing**: Controller marks personal data in order to limit processing. User may ask for such limitation if one of the following cases occur:
a) User disputes accuracy of personal data, in this case limitation exceeds for the period that enables Controller to check the accuracy of personal data;
b) processing is illegal, and User objects against deleting their data and asks for limitation of use;
c) Controller does not need personal data for processing, however, concerned party lays claim to them in order to propose, realize or protect legal demands; or
d) User has objected to legal processing done by Controller; in such cases limitation exceeds over a period in which it becomes clear whether Controller's legal interests dominate over concerned party's legal interests.

12.5. **Right to cancellation**: Controller deletes information if:
a) personal data is no longer needed for reasons they were recorded, or were handled

differently;
b) User withdraws their consent to processing, and there are no other legal bases for it;
c) User objects to processing and there are no prior rightful reasons for processing, or User objects to processing with direct sales objectives;
d) personal data was handled illegally;
e) personal data must be deleted to fulfil legal obligations claimed by European Union or member state laws;
f) User requests deletion or objects to processing, and data was recorded to offer services related to information technological society directly to children.
If Controller made personal data public – and according to cases mentioned above – has to erase them and must take reasonable steps, including technical ones – considering technology available and costs of realization – in order to inform Controllers involved about User requesting their personal data and the links referring to them or copies of personal data to be deleted.

Controller informs User and all Controllers that are provided with information about the correction, limitation and deletion. Notification might be neglected if it seems to be impossible, or requires unreasonable efforts. Controller informs User on demand about these addressees.

12.6. **Right to objection**: User has the right to object to their data being managed rightfully by Controller at any time because of personal reasons. In such cases, Controller cannot handle personal information any longer, except when Controller proves that there are obligatory rightful reasons for processing, having priority over concerned person's interests, rights and freedoms, or reasons that are related to proposal, enforcement or defence of legal demands.

13. Fulfillment of User's requests

13.1. Controller offers notification and taking actions for free, as described in Point 12. If User's request is obviously unfounded, or – especially for its repeated nature – exaggerated, Controller
a) might charge a reasonable price, or
b) might deny taking actions based on request,
considering data requested, or administrative costs of measures to be taken to fulfil request.

13.2. Controller informs User without any unreasonable delay, but maximum one month after receiving the request about actions that has been taken, including issuing copies of data. If necessary, considering the complexity of request and numbers of requests this deadline can be made longer with additional two months. Controller informs User about elongation of deadline together with indicating reasons of delay within one month after receiving the request. If concerned User sends their request electronically, Controller provides information electronically, except when concerned User asks for it in a different way.

13.3. If Controller does not take any steps as reaction to User's request, without delay

but within maximum of one month after receiving the request, Controller informs User about reasons why there have been no actions taken, and about the possibility of filing a complaint at Authority mentioned in Point 15 and can have the right to legal remedy described there as well.

13.4. User can hand in their request to Controller in any way that identifies them. Identifying Users who hand in a request is necessary because Controller can deal with only those requests that are entitled. If Controller has justified doubts about the identity of natural person handing in a request it can ask for other pieces of information to assure the identity of concerned User.

13.5. User can send their requests to Controller to the address 37 Váci Road, Budapest 1044 Hungary or to the e-mail address info@flexicar.hu Controller considers requests sent in e-mail genuine only if it was sent from an e-mail address registered at Controller's database. However, using another e-mail address does not mean in observance of such requests. Time of receiving e-mails is the first day after the e-mail was sent.

14. Data protection, data safety

14.1. Controller assures the safety of data and through technical and organizational actions, as well as internal rules of procedure ensures that laws and other data and secret protection rules are kept. Controller protects data especially against illegal access, change, forwarding, making public, deletion or effacement of data, moreover, it protects against accidental effacement and damage, as well as inaccessibility of data as a result of change in applied technology.

14.2. Data related to measuring number of visitors of the website and habits describing use of website are handled in Controller's information technological system in a way that prevents Controller to link data to anyone, right from the beginning.

14.3. Processing takes place to reach articulated and legal goals described in present policy to a necessary and proportional degree, based on relevant laws and recommendations, keeping appropriate safety measures.

14.4. In order to achieve these, Controller uses "https" protocol to reach the website, through which web communication can be encrypted and individually identifiable. Controller stores information in encrypted data stocks on separate lists insulated from each other based on processing goals to which certain Controller employees – performing tasks indicated in present policy – have access to, who have to protect data and it is their responsibility to handle this policy and relevant laws in an appropriate manner.

15. Enforcement of rights

Concerned parties may practice their prosecution of rights in front of a jury and also can turn to the National Authority for Data Protection and Freedom of Information:

Nemzeti Adatvédelmi és Információszabadság Hatóság
(National Authority for Data Protection and Freedom of Information)

Address: 1055 Budapest, Falk Miksa utca 9-11. (1055 Budapest, Falk Miksa Street 9-11.)
Postal address: 1363 Budapest, Pf. 9. (P.O. Box 9, Budapest, 1363 Hungary)
Telephone: +36 1 391 1400
Fax: +36 1 391 1410
E-mail: ugyfelszolgalat@naih.hu
Website: http://www.naih.hu/

In case choosing a process involving a courthouse, the lawsuit – based on concerned User's choice – can be initiated at the courthouse in concerned person's residence or place of stay, as courthouses are competent in confiscation of such lawsuits.

Download/print the document: HERE

2023.06.25.

<div align="right">Flexi-Car Rent Kft.</div>