#### Information about the use of cookies

# 1. Data management

The webpage at <a href="https://flexicarrent.hu">https://flexicarrent.hu</a> Internet address is operated 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).

We inform you that present <a href="https://www.flexicarrent.hu/">https://www.flexicarrent.hu/</a> website (hereafter: website) uses "cookies", with a Hungarian word "sütik" in order to improve the quality of its services and to make the usage of the website easier, and also in case of your approval to present advertisements. You can read about cookies in general and after that you can read about data management what is effectuated by the cookies of our website.

#### 2. Cookies in general

#### 2.1. What are cookies?

A cookie is such a group of data (alphanumerical information packet with changing content) that is sent to your device by the server of the website you are visiting. Cookies are stored in the browser programme of your computer, telephone or tablet, which can be read later by sending server. Cookies cannot be read by other websites, only the one that has placed them. Cookies inform us about the way visitors use our website. Cookies are meant to be used for administrative goals by Controller, to measure how many visitors enter the website and to make process of browsing easier by memorizing sites that were opened within website earlier.

No cookies contain personal information that could enable anyone to reach You through e-mail, telephone or post. Cookies themselves are not able to identify users, can only identify users' devices. In case You do not want to accept usage of cookies on the website You can set the browser You are using to send You a message about or to prevent placing them.

#### 2.2. How can you regulate the operation of cookies?

We place cookies on devices (computer, telephone or tablet) You are using during your visit on our website. We inform You about this at the beginning of browsing our website, when the main page is loading, in a pop-up window.

Your approval does not have to be asked to implement cookies on your device which are necessary to ensure the functions and comfortable usage of our website. We have to ask your approval for other purposes such as visit analysis alongside identifying your device or data collecting for marketing purposes. Your permission will be asked in the pop-up window mentioned above. This window can be bring up at any time by clicking on 'Cookie settings' sing at the bottom of the screen and your permission to each data collecting may be changed later as well.

Apart from the above mentioned setting option provided by us You can decide to ban and delete them any time in the settings of your browsing programme. However, we inform You that without using cookies, You will not be able to reach several functions which make browsing easier, even some of our services will probably not function properly.

# 2.3. Handling settings of cookies in browsers

You can modify your setting of cookies through a pop-up window or your browser. You can ban the use of cookies by activating a setting in your browser which enables refusing all or certain cookies. These settings can usually be reached at the "Settings" or "Preferences" menu of your browser. You can get more information by using these references.

Chrome: https://support.google.com/chrome/answer/95647?hl=hu

# Firefox:

 $\frac{https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalak-tarolnak-szami?re\ directlocale=en-US\&redirectslug=Cookies$ 

Internet Explorer: visit <a href="https://support.microsoft.com">https://support.microsoft.com</a> and write the word 'cookies' into the browser.

Safari: visit <a href="https://support.apple.com/hu-hu">https://support.apple.com/hu-hu</a> and write the word 'cookies' into the browser.

Opera: http://help.opera.com/Windows/10.50/hu/cookies.html

# 2.4. Types of cookies

Cookies can be session cookies appearing during work process, or persistent cookies. We also make difference between internal (comes from the first party) and external (comes from a third party) cookies. You can read about them bellow in order to understand cookies we use and why we use them.

#### 2.5. Cookies valid during work process

Cookies appearing during work process make it possible for us to recognize You while visiting our website, so browser can memorize every site change or choice made from site to site during browsing inside the website. These cookies enable You to progress through and backwards various pages of a website fast and smoothly, without having to identify yourself at every page, or having to repeat processes (e.g. filling in a form). After finishing browsing a website, or closing a browser, cookies are automatically erased from your device.

#### 2.6. Permanent cookies

Permanent cookies stay "permanent" on your computer for a certain period of time (days, weeks, months or years) after finishing browsing process, so they can help to recall preferences or activities of users when visiting a website later as well (e.g. by using them, username and password at that site can be stored). Until the end of expiry of validity period, saved cookies are stored on your device, however, You can delete them before determined deadlines.

# 2.7. Cookies coming from the operator of our website

These cookies come from the server of website being surfed. In this case, we are talking about functional cookies - and cookies that make usage comfortable - that are coming from the server storing website operated by Controller. We gave a description and details of functioning of them above. They remember IP address of your device, pages visited during browsing, incidentally, (based on your decision) your username and password.

Thus You can avoid repeating processes - when opening a new website or returning to a website - through opening the same pages, or - based on your decision - You do not need to identify yourself or log in again and again. We use cookies in order to provide our registered users appropriate entitlements; when users enter website, they get necessary entitlements. These cookies do not store any other information related to this, neither time of entry, nor who entered, we simply check entry entitlement with them.

These cookies are so-called work process cookies valid during browsing time. This means when somebody starts surfing the website, cookies are activated, and are valid until maximum of 15 minutes after the last activity, or are deleted when logging out.

An exception is a cookie that remembers – according to your decision - your log in data on your device.

# 2.8. Cookies coming from a third party

Cookies from a third party do not come from Controller or server that stores the website. These cookies are stored by Your computer, telephone or tablet as well during Your visit as follows:

#### 2.8.1. Google cookies

Files of Google Analytics© are used to monitor sites and collect information about the use of websites (number of visitors, visited sites, visitors' place of living, what other websites visitors have entered before, which browser they use, which operation system they use, which internet service they use, parameters of monitor visitors use, time of entering to the website and time of leaving it). We use these pieces of information to create statistics and improve our website.

We collect data only in case of your approval on a way which makes possible to identify the device you are using for browsing as well. In such case we use data to send you targeted advertising about our services.

These pieces of data are also available for Google Ireland Ltd. (Gordon House, Barrow Street, Dublin 4, Ireland), owner and operator of Google Analytics. Google Ireland Ltd. uses these pieces of information to forward specific advertisement to users, too. Google Ireland Ltd. puts together a group of interests based on browsing habits: it links data collected by cookies and browser ID or IP address of browser device. Then it forwards specific advertisements to the device. For further information please visit the following websites:

# https://www.google.com/analytics

# https://support.google.com/analytics/answer/2838718?hl=hu

Google Analytics© cookies are so-called persistent cookies, they are stored for maximum of two years, however, actual periods vary between 2 hours and six months, depending on type of cookies.

For further information about cookies - including viewing, handling and deleting cookies that have been placed - please visit http://www.allaboutcookies.org. In order to ban all tracking on any sites, please visit https://tools.google.com/dlpage/gaoptout.

Cookies like these operate only with your permission and on a way that your device is being identifies during collecting data as well.

# 2.8.2. Facebook cookies and pixel

As Google-cookies above Service of Meta Platforms Ireland Ltd. (Facebook - 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) also ensures online marketing services through cookies and through so called 'pixel'. The point in these is the same as the above described Google services only that in this case the targeted advertisements are visible for Facebook users. Data management is done by Meta Platforms Ireland Ltd. during this service. Through this service, Meta Platforms Ireland Ltd. has an insight into measurement of website and mapping browsing habits as well.

These pieces of information are stored on devices of Meta Platforms Ireland Ltd. as permanent cookies which work for no more than three months that are fixed on user's device which was used for browsing. Users may delete these cookies on their devices in

the settings menu of their browsers. During data collecting done by pixel nothing is being stored in your browser. Meta Platforms Ireland Ltd. also uses these pieces of data to forward targeted advertisements to users. By linking data - which have been collected by cookies and pixel - and browser ID or IP address of the browser Meta Platforms Ireland Ltd. gathers a group of interests based on browsing habits. Then it forwards targeted advertisements to device.

For further information please visit the following website of Meta Platforms Ireland Ltd.: <a href="https://developers.facebook.com/products">https://developers.facebook.com/products</a>.

Cookies like these work on the page only in case of your approval.

#### 2.8.3. Barion Pixel

Barion Pixel is a java script based tracking setup that is placed on Controller's website (similar to the operation of Google Analytics and Facebook Pixel) which follows the activity of website visitors. Barion Pixel collects several types of data about visitors, e.g. what kind of products they have seen, what they have clicked on os looked for, what they have placed into the basket, what they have purchased. (<a href="https://docs.barion.com/Barion\_Pixel">https://docs.barion.com/Barion\_Pixel</a>) It sends this data on to Barion's servers, Controller has no access to this data.

The purpose of data collection that is carried out by Barion Pixel is fraud prevention and also to support Barion's marketing purposes.

For more information, visit Barion Payment Zrt.'s website on <a href="https://www.barion.com/hu/adatvedelmi-tajekoztato/">https://www.barion.com/hu/adatvedelmi-tajekoztato/</a> and read 'Privacy Policy'.

# 3. Data management implemented by log files and cookies applied on our website

- 3.1. Concerned parties in processing: All Users who visits this website, regardless of whether they use the offered services or not at website.
- 3.2. Legal basis of processing: Act CVIII of 2001 'on certain issues of electronic commerce activities and information society services' (Hereafter Ekertv), § 13/A authorizes Controller to handle information that is technically absolutely necessary to provide services which function as intended. Log files and certain cookies carry out the procession of such data. Chapter for says about log files and You can read about cookies of these below. Consequently, it is the rightful interest of Controller to process data like this, based on GDPR Article 6, Paragraph (1), Point f).

Relying on this legal basis, Controller handles exclusively those types of data that are necessary to ensure a user-friendly operation of website, and works with them only until it is needed. These pieces of information are such technical data which is essential to provide an enjoyable appearance of website, proper and comfortable use of its functions.

Data are not forwarded to a third party and are not used for any other purposes. Controller works with service providers indicated in Chapter 14 under in connection with these data. As a result, processing does not have any risks on User's side, however, using the website properly is not possible without handling data. It is the rightful interest of Controller to operate website properly, as it can only provide its services this way, it is an inevitable condition for its functioning. Consequently, Controller handles information mentioned above in order to fulfil this goal as its rightful interest, and based on which rightful interest – because processing is not high risk for User – Controller limits User's autonomy to a proportional extent.

According to GDPR Article 6, Paragraph (1), Point a) the legal basis of data management and marketing activities lies upon the consent of the User. User can give its consent to data collection for data processing and marketing purposes by clicking on the check boxes that pop up when User starts browsing on the website.

#### 3.3. Determining the scope of handled data:

In order to ensure user-friendly browsing the handled data is:

- websites visited during entering website and the order of opening them
- User's IP address.

Data handled to measure popularity of website:

- websites visited during entering website and the order of opening them
- frequency of opening certain webpages on the website
- which other website User has come from to present website (only in case of websites that have a link to present website)
- determining User's geographical position (based on Internet service company, only approximate data about the device used for browsing)
- time when browsing is started,
- time of leaving the website (when browsing is finished),
- period while website is surfed.

In case of storing data that is handled to check entry rights when entering website (can be stored based on User's consent):

- User's e-mail address (as user name) or user name
- password
- IP address of User's device.
- 3.4. Purpose of processing: to provide a user-friendly and safe operation of the website and to do some online marketing activity.

This includes the following:

- a) Necessary and functional data processing ('Indispensable' and 'Functional' categories among pop-up windows):
- Identification of User's browser device, and remembering identifying data during browsing time based on IP address. Surfing the Internet becomes smoother, as without this function, Users would be obliged to identify themselves at each website they visit.

- b) Data processing about browsing habits ( 'Analytics' category among pop-up windows)
- Data that is necessary for the following purposes are recorded anonymously if you do not give your permission ('Analytics' is not ticked), which case they cannot be connected to a person. In this case your personal data is not processed.

In case of your permission ('Analytics' is ticked) data is recorded on a way that they are connected to the identification data (IP address) of the device

- Measuring the popularity and frequency of visits at webpages of website and the time spent on webpages in order to shape website to the needs of Users and to learn Users' main areas of interest.
- Identifying approximate place of User's device used for browsing, mapping the geographical demand of Controller's service.
- Identifying website from which User has arrived, in order to provide information about services of other websites that have links to present one, and to be able to get information about topics of User's interest.

By collecting this kind of data we can monitor and improve the efficiency of our marketing activity while promoting our services.

Controller's IT system uses the devices of Google Analytics (Google Ireland Ltd.) for collecting data described above. During visiting websites that applies the devices of Google Analytics Google cookies take note of preferences and information indicated by User that also means the recognition of data handled for measuring visits of the website and for mapping searching habits.

c) Data processing for marketing purposes ('Marketing' category among pop-up windows):

In case you agreed to collect browsing data on a not anonymous way ('Analytics' ticked) and to use them for marketing purposes ('Marketing' ticked)we are able to show you targeted advertisements during you are browsing on the Internet.

When targeted advertisements are visualize we can show our advertisements by using Google and Facebook's resources, at the same time Google and Facebook uses this data for their own purposes to show third parties' advertisements for you. These advertisements are based on your main areas of interest which are concluded from your browsing habits.

While doing so, Google Ireland Ltd. And Meta Platforms Ireland Ltd. (4. Grand Canal Square, Gran Canal Harbour, Dublin2, Ireland) set out the possible interests by connecting data described above and browser ID or the IP address of the device that was used for searching then targeted advertisements are sent to the given tool. It means that recorded data is not connected directly to you as a person but to the device that is being used for browsing.

Google Ireland Ltd. and Meta Platforms Ireland Ltd. have no access to any other data except those described under this section.

d) Data which is signed to the following purposes are handled on a way that they can be

connected to You, but we have access to them only this type of technical uses at the time of entering, otherwise they are stored on your device:

- your e-mail address or username and password, maybe storing them for making entering easier (based upon your decision, recording them on your device)
- during checking your access rights your e-mail address (as username) or your username and password (on a coded way, we do not know them), IP address of your browsing device.
- 3.5. Period of processing: Controller handles a part of data for the period of browsing, other data is stored for a variable time, but maximum of 2 years.

Data necessary for the operation of website in a user-friendly way (IP address, order of webpages visited during browsing) is recorded for the duration of browsing session, they are deleted when browsing finishes. Handling of these data is done by our own IT devices, third party does not have any access to them.

Username and password may be stored permanently based on User's decision by cookies being stored on User's device. User can delete them, thus control data storage period.

Data which serve as a base for measuring visits and mapping Users' habits of website is stored for maximum of two years. Cookies that make it possible are stored on your device. Deleting these cookies or prohibit their operation can be done at any time by you with the settings of your browser and also with switching off 'Analytics' and 'Marketing' categories if you click on 'Cookie settings' sign at the bottom of our website.

- 3.6. Way of data storing: on separate lists in our information technology system. Data related to providing a user-friendly services (IP-address, the order of sites visited during browsing session) are not stored by us. Pieces of information provided by cookies are stored on User's device. Cookies that gives data are stores on your device. Entering data that makes entering easier is stored on your device.
- 3.7. User may get more information about the process of information technology processing and about information technology data processing that is realized by using Google Analytics and Meta Platforms Ireland Ltd.'s devices on the website of Google Analytics <a href="https://www.google.com/intl/hu\_ALL/analytics/support">https://www.google.com/intl/hu\_ALL/analytics/support</a> and on the website of Meta Platforms Ireland Ltd. <a href="https://developers.facebook.com/products">https://developers.facebook.com/products</a>. We use only those functions recommended by Google Analytics and Meta Platforms Ireland Ltd. which were described above.
- 3.8. To learn more about informational technology data management made by Barion Pixel's accessories go on Barion Payment Zrt.'s website: <a href="https://www.barion.com/hu/suti-tajekoztato/">https://www.barion.com/hu/suti-tajekoztato/</a>

# 4. Log file registration

Our IT system uses electronic log entry to operate our website. In these log files we store the IP address, the User's browser type, Internet service provider, date/timestamp, reference- and leaving pages, number of clicks during visiting. It happens so that we could show our website properly on Your device and it makes possible to find the

circumstances of the mistake in case of a functional error. With these we can make browsing more stable and secure. It also makes us possible to handle the website and the administration. This data does not make possible to identify any identities and is stored for 30 days.

Further data processing of log files happens among the circumstances described in section 3 in that, visit analysis and marketing purpose data processing and usage do not happen with respect to log files.

#### 5. Using data processors

- 5.1. Parties involved in data processing: Users visiting the website.
- 5.2. Website is used by data processors to collect data for visit analysis and visualize targeted advertisements:

# Google Ireland Ltd.

Business registration: 11603307

Tax number: IE 6388047V

Residence: Gordon House, Barrow Street, Dublin 4, Ireland Postal address: Gordon House, Barrow Street, Dublin 4, Ireland

Telephone: +353 1 436 1000 Website: <a href="https://www.google.ie/">https://www.google.ie/</a>

# Meta Platforms Ireland Ltd. (Facebook)

Business registration: 462932 Tax number: IE 9692928F

Residence: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland Postal address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Telephone: +001 650 543 4800

Message: https://facebook.com/help/contact/540977946302970

Website: <a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a>

(Together as Data Processors hereafter)

- 5.3. Defining the scope of data involved in data processing: this relates to all browsing data described in present Cookie information, preferences and he conclusions drawn from these.
- 5.4. Goal of using data processors: Visit analysis of our website and also to ensure information technology used to visualize targeted advertisements for you
- 5.5. Period of data processing: It correlates with processing periods indicated in this Cookie information for processing with various purposes.

- 5.6. Type of data processing: Information technological data collecting by various online IT solutions.
- 5.7. Data processing does not serve any other purposes.
- 5.8. We do not make use of any other data processors except those named above.

This information report contains information about information technological data processing. For the validity of above described data processing and for particular information about data management in concern of other personal data please read the document called 'Privacy policy'.

Download/print the document: **HERE** 

2024.03.30.

Flexi-Car Rent Kft.