



Data Privacy Notice – Website cookie processing activities

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Classification: SOCWISE Public



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SOCWISE Kft. – Data Privacy Notice – Website cookie processing activities



Classification: SOCWISE Public

1 Overview

Information security is a vital component of business success and it is especially important for SOCWISE Kft. (furthermore, SOCWISE or Company). This document contains the rules on data protection.

1.1 Document Control

This document is reviewed annually and is reissued when revisions are necessary and approved. Obsolete copies of this document shall be destroyed.

1.2 Change History

Version	Change Date	Author	Change Description
1.0	25.09.2023.	Anonymized	Initial version

2 Applicability

These provisions shall be interpreted in accordance with the provisions of the current data privacy regulations. In case of contradiction between these provisions and the provisions of any other document entered into force prior to this document regarding the protection of personal data, these provisions shall prevail.

3 Introduction

We are committed to protecting the privacy of our customers and partners, and therefore we provide details of our data processing activities. In this document, you will find information about your rights with data protection, the scope of personal data processed, our company's data protection principles and responsibilities, and the security measures and guarantees implemented.

In order to record the internal data management processes of SOCWISE Kft. (hereinafter also referred to as: the Data Controller) and to ensure its obligations in relation to data management activities, our data management activities listed in this document are described in detail below.

3.1 Information about the data controller

Name of the data controller	SOCWISE Kft.
Head office	120-122. Róna street, Budapest, ZIP: H-1149
Company registration number	01-09-356167
Website	www.socwise.eu
E-mail address	socwise@socwise.eu
Data Protection Officer	Data Controller not required to appoint a Data Protection Officer

3.2 Description of data processing activities

Cookies are small data files that are placed in the user's (website visitor's) web browser and collect and store information about the website. This type of data collection may provide usability features to users and support the proper functioning of the website, but may also be part of a data processing activity. For this reason, the following describes our cookie-related data processing activities through our website.

3.2.1 Essential cookies (strictly necessary)

The essential cookie provides functions that are necessary for the functioning of the website (e.g. filling in forms). As the website cannot function without this cookie, the visitor's consent is not required for the use of the cookie.

The legal basis for the processing, in this case, is the legitimate interest of the Data Controller in the proper functioning of the website according to Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

3.2.2 Optional cookies: statistical, marketing cookies

A statistical or analytical cookie (Google Analytics, Hotjar) collects statistical data on how visitors use the website, which topics they view, what they click on, and how they scroll through the website. It tells us, for example, which articles and content are the most visited. The use of such cookies is not mandatory and requires the consent of the visitor.

The purpose of a marketing cookie is to display targeted, personalized advertising on various advertising platforms and provide the possibility to subscribe (Getresponse). Data processing is not essential, so users' consent is required to run them.

The legal basis for the processing, in this case, is the consent of the visitor, given in the pop-up window on the website. The consent can be withdrawn at any time, but the withdrawal does not affect the lawfulness of the processing that preceded it. In the case of withdrawal, no data are collected or stored.

Name / Provider	Domain	Expiration (duration of data processing)	Description (purpose)
Google Analytics	.socwise.eu	13 months	Google Analytics uses the data to collect information about the number of times a user has visited the website, the date of the first visit and the date of the last visit. It registers a unique identifier which is used to generate statistics about how the visitor uses the website.
Hotjar	.socwise.eu	12 months	Hotjar uses cookies to collect information about users' behaviour and their devices. Hotjar is a technology service that helps us better understand the user experience and allows us to design and maintain services based on user feedback.
Getresponse	.getresponse.com	Max. 12 months	Getresponse is a marketing automation and form filling platform. The cookies are all used to enable the visitor to fill in the forms available on the website. They help remember the content entered into the forms (even if the visitor leaves the website and returns later) and allow the form to be sent to us.
MooveGDPR	.socwise.eu	12 months	The MooveGDPR Wordpress plugin is used to manage the use of cookies on the website, visitors' consent

Linkedin	.linkedin.com	12 months	The purpose of cookie processing is to provide a link to the LinkedIn site of SOCWISE and to run the LinkedIn cookies necessary to view the LinkedIn site.
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3.2.3 Source of the data

In the case of cookies, the source of the data is the activity of the data subject, the collection of data by the cookie used. Although the source of the data is the data subject, not all cookies that are run collect specific identifiable data. No profiling or automated decision-making is carried out in respect of the data processing described above.

4 Data transfers and data security

In the context of the processing activities described in this notice, data will be transferred to the following recipients who may be involved in the provision of the service or related security solutions.

Recipient information	Purpose of the transfer	Contact of Data Processor
Google Ireland	Using Google Analytics	Privacy
Hotjar Malta	Hotjar website behavior analysis application	Privacy
Getresponse Poland	Getresponse form filling application	Privacy

4.1 Information about cookie settings

Modern browsers allow you to change cookie settings. Some browsers automatically accept cookies by default, but this setting can be changed to prevent the user from automatically accepting cookies in the future. If you change this setting, the browser will offer you the option to set cookies each time you change it.

Please note that, as cookies are intended to support and facilitate the usability and processes of the website, we cannot guarantee that the visitor will be able to use all the functions of the website to their full extent if cookies are disabled. The website may then function differently than intended in the browser.

More detailed information on cookie settings for the following browsers:

- a) [Chrome](#)
- b) [Firefox](#)
- c) [Internet Explorer](#)
- d) [Microsoft Edge](#)
- e) [Safari](#)

Please note that when using an ad-blocker, the cookie banner (setting) may not always be displayed. If you wish to view it, please deactivate the ad-blocker application.

4.2 Data protection measures

The Controller shall take the necessary technical and organizational measures and establish appropriate rules of procedure to ensure the security of personal data throughout the entire process.

The Data Controller has implemented and maintains an Information Security Management System based on the ISO 27001 international standard, whose information security controls also ensure the security of data processing.

5 Rights and remedies in relation to data processing

In relation to the processing activities, the persons concerned (Data Subjects), i.e. you, have certain rights, which you can find out about below. You can exercise your rights through the contact details of the Data Controller given above.

If the organization acts as a data processor (e.g. in the course of providing services to the client), the customer should be the data subject's enforcement claim handler, as it is the data controller. An adjudicated, enforceable data subject enforcement request should be forwarded to the organisation by the customer's contact person.

5.1 Right of access to personal data

You may request information from the Data Controller about:

- what personal data,
- on what legal basis,
- for what processing purposes,
- from what source,
- for how long it is processed,
- to whom, when, on the basis of which law, to which of your personal data the controller has given access or to whom the controller has transferred your personal data.

You may request a copy of your personal data processed by the controller under Article 15 of the GDPR. We may charge an administrative fee for additional copies, the amount of which and the method of payment will be notified in advance to the contact details you have provided to us for this purpose.

5.2 Right to rectification

You have the right to ask the Data Controller to modify any of your personal data (for example, to change your e-mail address at any time). The Data Controller will comply with your request without undue delay but within one month at the latest and will notify you accordingly to the contact details you have provided for this purpose.

5.3 Right to erasure, right to be forgotten

Based on your right to erasure, you have the right to have your personal data erased from the Data Controller's systems without undue delay upon your request.

The "right to be forgotten" is an extension of the right to erasure to the online environment, whereby, if the Controller has disclosed your personal data and is required to erase it, it must take reasonable steps to inform the controllers who process your personal data that you have requested the erasure of links to or copies of your personal data.

In relation to this data subject right, it is important to note, however, that it is not possible to erase or "forget" personal data in one of the cases set out in Article 17(3) of the GDPR (e.g. where there is a legal obligation to retain the data).

5.4 Right to restriction of processing (blocking)

You have the right to have the controller restrict, commonly known as block, the processing of your personal data at your request if one of the following conditions is met.

- You contest the accuracy of your personal data. In this case, the restriction shall apply for the time necessary to allow the controller to verify the accuracy of those personal data.
- The processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use.
- The controller no longer needs the personal data for processing, but you require them for the establishment, exercise, or defense of legal claims.
- You have objected to the data processing. In this case, the restriction applies for a period until it is established whether the controller's legitimate grounds prevail over your legitimate grounds. The Data Controller will inform you in advance of the unblocking.

5.5 Right to data portability

You may request that the Data Controller sends the personal data you provided in a structured, commonly used, machine-readable format to the contact details provided for this purpose. You also have the right to have this data transmitted by the Controller to another Controller, where technically feasible.

The right to data portability does not apply where the legal basis for processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.

5.6 The right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data where the processing of your personal data is based on the legitimate interests of the controller, or grounds of public authority or for direct marketing purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for these purposes.

5.7 Complaints and remedies

If you consider that the Data Controller has infringed the applicable data protection provisions in the processing of your personal data, you may:

- Notify the Data Controller.
- File a complaint with the supervisory authority.

Contact details of the Supervisory Authority:

Nemzeti Adatvédelmi és Információszabadság Hatósága / *Hungarian National Authority for Data Protection and Freedom of Information*

Mailing address: 1363 Budapest, Pf. 9.

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Email: ugyfelszolgalat@naih.hu

Website: <https://www.naih.hu/>

- You can go to court.

You have the right to apply to a court, which will rule on the case out of turn, to protect your data. You can find the contact details of the courts at the following link: <http://birosag.hu/torvenyszekek>.