

# PRIVACY POLICY

[www.szovadaszo.hu](http://www.szovadaszo.hu)

Effective from 14 April 2025, until revoked

## 1. Content of the information

WORD-HUN-TER is an English language game and WÖR-TER-JÄ-GER is a German language game which use the same game rules and structure as the published Hungarian SZÓ-VA-DÁ-SZÓ. These language card games (hereinafter: Game) are still under development – they are in the testing phase.

Just like in the Hungarian card game, in Word-hun-ter and Wör-ter-jä-ger players have to create words by putting cards together according to the rules of the given game type.

The operator of the website [www.szovadaszo.hu](http://www.szovadaszo.hu) (hereinafter: Website) hereby informs the persons visiting the Website, as Data Subjects, about the Privacy Policy of the Website in accordance with Regulation (EU) No. 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter: GDPR).

The Data Controller treats the personal data of the Data Subjects confidentially and takes all security, technical and organizational measures that guarantee the security of the data and prevent their destruction, unauthorized use and unauthorized modification.

## 2. Definitions

The most important terms in this document and their interpretation:

- **Data subject:** any natural person who is identified or identifiable on the basis of any information;
- **Personal data:** any information relating to an identified or identifiable natural person (the Data Subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Data controller:** the natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by the EU or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by the EU or Member State law;
- **Data processing:** any operation or set of operations which is performed on personal data or data files, whether or not by automated means, such as collection, recording, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Data transfer:** making data available to a specific third party;
- **Data file:** a set of data processed in a register;
- **Third party:** a natural or legal person or an organisation without legal personality who is not the same as the Data Subject, the Data Controller, the Data Processor or the persons who carry out operations relating to the processing of personal data under the direct control of the Data Controller or the Data Processor;

- **Data processing:** The performance of technical tasks related to data processing operations carried out by the controller, regardless of the method and means used to carry out the operations and the place of application, provided that the technical task is performed on the data;
- **Data processor:** the natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- **Consent of the Data Subject:** any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which the Data Subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data concerning him or her;
- **Restriction of processing:** the marking of stored personal data with a view to restricting their future processing;
- **Data protection incident:** a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored, or otherwise processed.

*The terms used in this document are in accordance with the applicable laws, in particular*

- Act CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter: Privacy Act.),
- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (hereinafter: GDPR)
- Act V of 2013 on the Civil Code.

### 3. Data controller

*name of company/individual entrepreneur*

Represented by: Felvégi Zsuzsanna

email: [kapsolat@szovadaszo.hu](mailto:kapsolat@szovadaszo.hu)

### 4. Circumstances of data processing, legal basis, purpose, scope of data processing

The Data Controller processes the personal data of the Data Subjects in the cases specified below as follows.

The Data Controller is not responsible for the correctness and adequacy of the data provided by the Data Subjects.

#### 1) Request an email notification about the release of a game using the Form provided on the Website

Scope of data subjects	Scope of data processed	Purpose of data processing	Legal basis for data processing	Duration of data processing, date of deletion
A person requesting an email notification about the release of the Game via the Website.	<ul style="list-style-type: none"> <li>• name</li> <li>• email address</li> <li>• country (optional)</li> <li>• comment (optional)</li> </ul>	Sending a one-time email notification about the release of the Game, informing the Data Controller about comments, the geographical location of the interested party (optional).	Consent to data processing [GDPR Article 6 (1) a)]	Until the consent is withdrawn, at the latest until the notification is sent. It is possible to withdraw the consent given to the processing of data via email.



## **2) Cookie management**

The Website uses only necessary (session) cookies, it does not use functional cookies.

Session cookies are necessary for browsing the Website and using its functions. Without the use of session cookies, the smooth use of the website cannot be guaranteed. Their validity period covers the duration of the given visit, the cookies are automatically deleted at the end of the session or when the browser is closed.

## **5. Rights of the Data Subject**

The Data Subject is provided with the possibility to exercise all rights related to the legal basis of the data processing case. The Data Subject may submit requests regarding the exercise of individual rights in writing:

- by email: by electronic mail to [kapsolat@szovadaszo.hu](mailto:kapsolat@szovadaszo.hu)

The Data Controller shall verify the identity of the Data Subject in all cases.

The Data Controller shall inform the Data Subject of the measures taken in response to the request sent to the Data Controller for the exercise of the rights provided without undue delay, but no later than one month from the receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by another two months.

The Data Controller shall inform the Data Subject of the extension of the deadline, indicating the reasons for the delay, within one month from the receipt of the request. If the Data Subject has submitted the request electronically, the information will be provided electronically, unless the Data Subject requests otherwise. If the Data Controller does not take action on the Data Subject's request, it shall inform the Data Subject without delay, but no later than one month from the date of receipt of the request, of the reasons for the failure to take action and of the fact that the Data Subject may file a complaint with a supervisory authority and exercise his or her right to a judicial remedy.

### **Right to information**

The Data Subject has the right to request information at any time about the personal data concerning him or her processed by the Data Controller and information related to their processing.

At the request of the Data Subject, the Data Controller shall provide information about the data concerning him or her processed by the Data Processor, their source, the purpose, legal basis, duration of the data processing, as well as the name, address and activities of the Data Processor related to the data processing, the circumstances, effects and measures taken to prevent any data protection incident, as well as the legal basis and recipient of any data transfer.

The Data Controller shall provide the Data Subject with a copy of the personal data subject to data processing upon request. For additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. Upon request submitted electronically, the information shall be made available in electronic format, unless the Data Subject requests otherwise.

If the Data Subject's request is clearly unfounded or, in particular due to its repetitive nature, excessive, the Data Controller may charge a reasonable fee, taking into account the administrative costs of providing the requested information or taking the requested action, or may refuse to take action based on the request.

After being informed, if the Data Subject does not agree with the data processing or the accuracy of the processed data, he may request the correction, completion, erasure, restriction of processing of personal data concerning him or her, in certain cases he or she may object to the processing of such personal data, or may seek legal remedy.

**Right to correction and completion**

The Data Subject may request the correction of inaccurate personal data concerning him processed and the completion of incomplete data.

**Right to erasure**

The Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Data Controller;
- b) the Data Subject withdraws his or her consent on which the processing is based and there is no other legal basis for the processing;
- c) the Data Subject objects to the processing on grounds relating to his or her particular situation and there are no overriding legitimate grounds for the processing;
- d) the Data Subject objects to the processing of personal data concerning him or her for direct marketing purposes, including profiling where this is related to direct marketing;
- e) the Data Controller unlawfully processes the personal data;
- f) the personal data were collected in connection with the provision of information society services directly to children.

The Data Subject may not exercise the right to erasure or to be forgotten if the processing is necessary:

- a) for the exercise of the right to freedom of expression and information;
- b) on grounds of public interest in the field of public health;
- c) for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, where the exercise of the right to erasure would render such processing impossible or would seriously jeopardise such processing; or
- d) for the establishment, exercise or defence of legal claims.

**Right to restriction of processing**

At the request of the Data Subject, the Data Controller shall restrict the processing of the personal data where one of the following conditions is met:

- a) the Data Subject contests the accuracy of the personal data, in which case the restriction shall apply for a period enabling the accuracy of the personal data to be verified;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to the processing; in which case the restriction shall apply for a period of time until it is determined whether the legitimate grounds of the Data Controller override those of the Data Subject.

If processing is restricted, personal data may be processed, with the exception of storage, only with the consent of the data subject, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for important public interests of the EU or of a Member State. The Data Controller shall inform the Data Subject in advance of the lifting of the restriction on processing.

The Data Controller shall inform all recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out by the controller, unless this proves impossible or involves a disproportionate effort. Upon request, the Data Subject shall be informed of these recipients.

#### **Right to data portability**

The Data Subject has the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and to transmit these data to another Data Controller.

The right to data portability may only be exercised in the case of data whose legal basis for processing is the Data Subject's consent, i.e. in the case of subscribing to newsletters under this information.

#### **Right to withdraw consent to data processing**

The Data Subject has the right to withdraw his or her consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of data processing based on consent prior to its withdrawal.

#### **Right to object**

The Data Subject has the right, on grounds relating to his or her own situation, to object at any time to the processing of his or her personal data necessary for the purposes of the legitimate interests pursued by the Data Controller.

In the event of an objection, the Data Controller shall no longer process the personal data unless there are compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject, or for the establishment, exercise or defence of legal claims. Where the processing of personal data is carried out for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

## **6. Handling of data protection incidents**

A data protection incident is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed. The Data Controller shall keep a record of the personal data affected by the incident, the scope and number of Data Subjects, the date, circumstances, effects, and measures taken to address the incident, in order to monitor the measures taken in connection with the data protection incident, to inform the supervisory authority, and to inform the Data Subject.

## **7. Rights to exercise**

The Data Subject may exercise his or her rights by sending a request by email. It is not possible to exercise any rights by telephone.

If the Data Controller has doubts about the identity of the natural person submitting the request, he or she may request the provision of additional information necessary to confirm the identity of the applicant.

If the Data Subject's request is clearly unfounded or excessive (especially considering its repetitive nature), the Data Controller may charge a reasonable fee for fulfilling the request or may refuse to take action. The Data Controller shall bear the burden of proof.

The Data Subject may, pursuant to Privacy Act, the GDPR and the Civil Code:

a) contact the National Data Protection and Freedom of Information Authority,

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

Mailing address: 1363 Budapest, Pf.: 9

email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu);

Website: [www.naih.hu](http://www.naih.hu)

b) or, at his or her choice, he or she may enforce his or her rights before the court competent for the place of residence of the defendant or the place of residence of the Data Subject.

## 8. Data transfer

Personal data may be accessed by the Data Controller's employees and Data Processors in order to provide the Service and achieve the stated purposes, to the extent necessary to achieve the purpose.

The Data Controller does not transfer personal data to third parties other than those specified. This does not apply to any mandatory data transfers prescribed by law, which may only take place in exceptional cases.

The court, the prosecutor, the investigating authority, the misdemeanour authority, the administrative authority, the National Data Protection and Freedom of Information Authority, or other bodies authorized by law may contact the Data Controller in order to provide information, communicate, transfer data, or make documents available.

Before fulfilling each official data request, the Data Controller examines each individual data item whether the legal basis for the data transfer actually exists.

## 9. Other provisions

If the scope of the data processed or other circumstances of data processing change, the Data Controller reserves the right to unilaterally amend this Privacy Policy within 30 days in accordance with the provisions of GDPR, with prior notification to the Data Subjects via the Website. After the amendment enters into force, the Data Subject implicitly accepts the contents of the amended Privacy Policy. Please read the amendments to Privacy Policy carefully in all cases, as they contain important information about the processing of your personal data.

The information is available from the [Privacy Policy](#) menu item of the [www.szovadaszo.hu](http://www.szovadaszo.hu) website.