

PRIVACY POLICY

Jégaréna Kft. organizes a training camp called "Summer Exposure Combine 2025" (hereinafter referred to as "Training"), for which registration is made possible at <https://www.reflife.hu> This information describes the details of how to apply for the camp.

1. Controller

Name: Jégaréna Kft.

Registered office and postal address: 1033 Budapest, Vajda János street 8.

Phone: +36 70 415 9152

E-mail: info@exposurecombine.com

2. Legal basis for data processing

The processing by Jégaréna Kft. is carried out on the basis of Regulation (EU) 2016/679 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 of the European Union and of the Council (hereinafter referred to as the GDPR).

Jégaréna Kft. fulfills its obligation to provide information to natural persons (hereinafter referred to as Data Subjects) by displaying this Privacy Policy on the registration interface and publishing it in the camp.

3. In case of data reason related to registration in the camp, the purpose of data processing and the scope of the processed data are necessary

3.1 Data required for the training contract

Personal data	Purpose of data processing	Legal basis for data processing
name, date of birth, address	data required for a training contract	Article 6 (1)b) of the GDPR contract
e-mail address, telephone number		
determination of referee level	classification, in order to prepare a training plan	Article 6 (1)b) of the GDPR contract
gender, height, body weight	to provide applicants with sport dresses and jerseys	

Billing data (name, country, address, tax ID)	data required to issue an invoice	
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Duration of data processing: Until the 10th day after the end of the camp in case of failure to conclude the contract, or 5 years in the case of termination of the contract. The retention period of data related to invoicing – based on the Act C of 2000 on Accounting – is 8 years.

3.2 Other personal data necessary for the organization

Personal data	Purpose of data processing	Legal basis for data processing
food allergy, intolerance	ensuring the right diet	Article 6 (1) a) and Article 9 (2)a) of the GDPR consent
additional personal information in the "About Me" section	any information, experience, skills that the applicant wishes to share for the classification	
mode of travel, requesting accommodation	hotel booking, assistance in arriving at the venue	Article 6 (1) a) of the GDPR Consent
Name, e-mail address	transfer data to hotel in order to book rooms	Article 6 (1) a) of the GDPR consent

Duration of data processing: Until the withdrawal of the consent of the data subject, but no later than 60 days after the completion of his or her training.

4. Recipients

5.1 Processor:

Name: Infohullám Kft.

Headquarters: 1147 Budapest, Ilosvai Selymes str. 61. 3 em. 1

Company registration number: 01-09-899234

5.2 Other recipients are:

a. Accommodation:

Name: Accor-Pannonia Hotels Zrt.

Headquarters: 1013 Budapest, Krisztina körút 41-43. 1. em. Company registration number: 01-10-041748

- b. Payment processors used when using the online payment system:

You can read more about stripe security here: <https://stripe.com/docs/security/stripe>

5. **Security of Personal Data**

Jégaréna Kft. undertakes to ensure the security of the data, to take the technical and organizational measures that ensure that the recorded, stored and processed data are protected, and to do everything in its power to prevent their destruction, unauthorized use and unauthorized alteration, according to the current technology. It also undertakes to call on all third parties to whom the data may be transmitted or transferred to fulfil their obligations in this regard.

6. **Rights of the Data Subjects related to data processing**

6.1 *Right of access*

The Data Subject shall have the right to obtain information from Jégaréna Kft. - through the contact details provided in points 1 and 2 - as to whether personal data concerning his/her are being processed, and, if such processing is in progress, the right to obtain from Jégaréna Kft. whether Jégaréna Kft.:

- what personal data
- on what legal basis
- for what purpose of data processing
- how long will it be treated; and that
- to whom, when, under what law, which of his/her personal data has been granted access to or to whom Jégaréna Kft. has transferred his/her personal data;
- the source of his/her personal data;
- whether Jégaréna Kft. uses automated decision-making and its logic, including profiling.

Jégaréna Kft. shall provide a copy of the personal data undergoing processing to the data subject for this purpose upon request, it shall make it available free of charge for the first time, after which it shall be administratively may charge a reasonable fee based on costs.

In order to meet data security requirements and to protect the rights of the data subject, Jégaréna Kft. is obliged to satisfy the data subject and the person wishing to exercise his right of access, the matching of his/her identity, to this end, the provision of information, inspection or the issue of a copy thereof shall also be subject to the identification of the person concerned.

6.2 *Right to rectification*

The data subject may request that Jégaréna Kft. amend any of his/her personal data by contacting the contact details provided in points 1 and 2. If the data subject can credibly prove the accuracy of the corrected data, Jégaréna Kft. will fulfill the request within a maximum of one month and will notify the person concerned at the contact details provided by him.

6.3 Right to blocking (restriction of processing)

The data subject may, through the contact details provided in points 1 and 2, request that the the processing of his/her personal data is restricted by Jégáréna Kft. (due to the limited nature of the processing and ensuring that treatment is kept separate from other data) where:

- disputes the accuracy of his/her personal data (in which case the Jégáréna Kft. refers to the limit the processing for as long as you control the processing of personal data accuracy)
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims
- the data subject has objected to the processing (in this case, the restriction applies to the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject).

6.4 Right to object

The data subject may object to the processing at any time on grounds related to his/her particular situation through the contact details provided in sections 1 and 2 if he or she considers that Jégáréna Kft. would not process his/her personal data properly in connection with the purpose indicated in this privacy policy. In this case, it is for Jégáréna Kft. to demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or which are related to the establishment, exercise or defence of legal claims.

6.5 Right to erasure

The data subject may request the erasure of his/her personal data if:

- Jégáréna Kft. no longer needs it for the purposes for which it was collected or otherwise processed
- the data subject withdraws his/her consent and there is no other legal basis for the data processing
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing
- if the personal data have been unlawfully processed
- where the personal data have to be erased in order to comply with a legal obligation to which Jégáréna Kft. is subject
- if the personal data have been collected in connection with the offer of information society services.

7. Remedies

If you have any questions or complaints about this data processing, please contact Jégáréna Kft. at one of the following contact details:

E-mail: info@exposurecombine.com,

Registered office and postal address: 1033 Budapest, Vajda János street 8.

Phone: +36 1 460 6863

In all cases, we will examine complaint of the Data Subject and will do our best to deal with it properly. Jégáréna Kft. will comply with their request to exercise the rights of the Data Subjects within thirty days of the submission of the request. Depending on the number and complexity of the receipt of the requests, this deadline may be extended by a further two months, the reason for which Jégáréna Kft. shall inform the Data Subject within one month.

If, despite his/her complaint, you continue to complain about the way Jégáréna Kft. handles his/her personal data or do not wish to lodge a complaint with Jégáréna Kft., you may exercise the following remedies.

Contact details of the Supervisory Authority:

National Authority for Data Protection and Freedom of Information

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

Postal address: 1363 Budapest, Pf.: 9.

Phone number: 06 1/391-1400 Fax: 06 1/391-1410

This Privacy Policy is valid from: January 15, 2025