



Effective date: May 1, 2025

1. Introduction

1.1. Identification of the Data Controller

This Privacy Policy (*hereinafter: Policy*) provides information about how Márton Bocz, sole proprietor; registered office: 1076 Budapest, Péterfy Sándor u. 27.; (*hereinafter: Data Controller*) collects, uses, stores, and protects the personal data of Users during the use of the online adventure game available at hungarygames.hu (*hereinafter: Service*).

The Data Controller is committed to protecting the User's personal data and acts at all times in accordance with the General Data Protection Regulation of the European Union (*Regulation (EU) 2016/679 of the European Parliament and of the Council – hereinafter: GDPR*) and the applicable Hungarian data protection laws, particularly Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (*hereinafter: Info Act*).

Contact information for data protection inquiries:

- E-mai: hello@hungarygames.hu
- Mailing address: 1076 Budapest, Péterfy S. u. 27.

Under the GDPR, a data controller is a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of processing personal data. The Data Controller identified in this Policy is responsible for the processing of the User's personal data. Clear and accessible identification of the Data Controller is essential for transparency and user trust, enabling data subjects to exercise their rights and ensuring the accountability of the Data Controller. Transparency is a fundamental principle of the GDPR, and proper identification of the Data Controller is its first expression.



1.2. Scope and Purpose of the Policy

This Policy applies to all users of the Service (*hereinafter: User*). Its purpose is to provide detailed and comprehensible information on what personal data is processed by the Data Controller, for what purpose, on what legal basis, for how long, and what rights the User has in relation to this data processing.

The Data Controller considers the protection of Users' personal data to be of utmost importance and respects their right to informational self-determination. The Policy aims to fulfill the GDPR's requirement of transparent communication..

2. Personal Data Processed

The Data Controller processes only the personal data specified below, for the indicated purposes and legal bases, and for the specified duration, respecting the principles of data minimization and purpose limitation. Personal data refers to any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

2.1. Contact Information

Data Processed: Only the User's email address as voluntarily provided. In line with the principle of data minimization, the Data Controller requests only the data strictly necessary to achieve the stated purpose (in this case, the email address).

Purpose of Processing: The User's email address is used by the Data Controller exclusively for the following specific purposes:

- Sending game codes related to the Service to the User.
- Providing information about discounts, promotions, and offers related to the Data Controller's own games and services (direct marketing).



Data Sharing with Third Parties: The Data Controller declares and guarantees that email addresses collected for this purpose will never be shared with, sold to, or made accessible to third parties for their own marketing or other purposes.

Retention Period: The User's email address will only be retained as long as necessary to fulfill the above purposes, but no longer than until the User withdraws their consent (unsubscribes). The User may withdraw their consent for direct marketing at any time, free of charge and without justification. Details about how to unsubscribe are provided in Section 5. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

2.2. Billing Information

Data Processed: If the User purchases a paid Service, the Data Controller processes the billing and contract-related data provided by the User. These typically include: Name (billing name), Billing address (country, city, street address, postal code), Tax number (in the case of company purchases), and transaction details (purchased item/service, amount, date). The Data Controller adheres to the principle of data minimization and only processes the data necessary for legal compliance and contract execution.

Purpose of Processing

- Processing payment transactions and fulfilling the contract (providing the paid game/service).
- Issuing and delivering invoices in compliance with legal regulations.

Complying with Hungarian accounting and tax laws (particularly Act C of 2000 on Accounting).

Legal Basis for Processing

- Processing is necessary for the performance of a contract (Article 6(1)(b) GDPR).
- Processing is necessary for compliance with a legal obligation to which the Data Controller is subject (Article 6(1)(c) GDPR), in particular the invoicing and record-keeping obligations of the Accounting Act.



Data Sharing (Processors): The Data Controller may use data processors to handle billing data (e.g., payment service provider, accounting firm, invoicing software provider). The Data Controller ensures that only processors providing appropriate safeguards for GDPR compliance and the protection of data subjects' rights, with adequate technical and organizational measures, are engaged. Written agreements (data processing agreements) are signed with all processors to ensure that personal data is processed solely on the Data Controller's instructions, for the agreed purpose and using appropriate security measures.

Retention Period: Under Section 169(2) of the Accounting Act, the Data Controller must retain all accounting records (including invoices and related billing data) in a readable format for 8 years following the year of issuance. This legal obligation overrides any prior deletion request concerning this data category (see Section 5, Right to Erasure). Other non-accounting contract-related data may be retained for up to 5 years based on the general limitation period under the Civil Code, but the 8-year accounting retention period applies to billing data.

3. Cookies and Other Tracking Technologies

The Data Controller hereby informs you that the Service's website does not use any cookies or other technologies capable of tracking users (e.g., web beacons, pixels).

Accordingly, no cookies are placed on the User's device during the visit to the website, and the Data Controller does not automatically collect data about the User's browsing behavior or preferences using such technologies. This approach greatly simplifies data protection compliance, as there is no need for cookie consent mechanisms or detailed cookie policies. The Data Controller aims to strengthen privacy and transparency through this practice.

4. Data Security

The Data Controller is committed to the security of the User's personal data. Appropriate technical and organizational measures have been implemented to protect the personal data processed against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.



These measures may include, but are not limited to, restricting access rights, applying encryption technologies (where relevant), and regularly backing up and reviewing systems. The Data Controller ensures that any data processors also provide an appropriate level of data security. However, it is important to note that while the Data Controller takes all reasonable steps to protect data, the absolute security of data transmitted over the internet cannot be guaranteed. For security reasons, the Data Controller does not publicly disclose the full details of its security measures but assures that they comply with GDPR requirements and industry standards.

5. User Rights

Under the GDPR, you have the following rights regarding the personal data processed by the Data Controller:

Right of Access (Article 15 GDPR): The User has the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them is being processed, and, if so, access to the personal data and related information (purposes, categories, recipients, retention period, rights, complaints, data sources). Upon request, the Data Controller will provide a copy of the processed personal data.

Right to Rectification (Article 16 GDPR): The User has the right to request the rectification of inaccurate personal data concerning them without undue delay. Considering the purpose of processing, the User also has the right to have incomplete personal data completed.

Right to Erasure (Right to be Forgotten) (Article 17 GDPR): The User has the right to request the deletion of personal data concerning them without undue delay where the data is no longer necessary for the purposes for which it was collected; where the User withdraws consent (and no other legal basis applies); where the User objects to processing (and there are no overriding legitimate grounds); where the data was processed unlawfully; or where the data must be erased to comply with a legal obligation. An important exception is that the right to erasure cannot be exercised if data processing is necessary for legal obligations (e.g., 8-year accounting retention under the Accounting Act).



Right to Restriction of Processing (Article 18 GDPR): The User has the right to request restriction of processing if they contest the accuracy of the data (for the duration of verification); if the processing is unlawful but the User opposes erasure; if the Data Controller no longer needs the data but the User requires it for legal claims; or if the User has objected to the processing (pending verification).

Right to Data Portability (Article 20 GDPR): If processing is based on the User's consent or a contract and carried out by automated means, the User has the right to receive the personal data concerning them in a structured, commonly used, machine-readable format, and to transmit those data to another controller.

Right to Object (Article 21 GDPR): The User has the right to object at any time to the processing of their personal data for direct marketing purposes. If the User objects to processing for such purposes (e.g., unsubscribes from promotional emails), the personal data shall no longer be processed for these purposes.

Right to Withdraw Consent (Article 7(3) GDPR): Where processing is based on the User's consent (such as the use of their email address to send game codes or promotions), the User may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

Exercising Rights: The User may exercise the above rights by submitting a written request to the contact details provided in Section 1 (primarily the Data Controller's email address for data protection inquiries). The Data Controller will respond within one month of receiving the request. If necessary—taking into account the complexity and number of requests—this period may be extended by a further two months. In such cases, the User will be informed of the extension and the reasons for the delay within one month of receiving the request. The Data Controller may request additional information necessary to verify the identity of the applicant. Providing such information and taking action is free of charge, except in cases where the request is manifestly unfounded or excessive (especially if repetitive).



6. Right to Lodge a Complaint

If you believe that the Data Controller has violated applicable data protection requirements—particularly the provisions of the GDPR—when processing your personal data, you have the right to lodge a complaint with the supervisory authority.

The Hungarian supervisory authority is:

National Authority for Data Protection and Freedom of Information (NAIH)

- **Mailing address:** 1363 Budapest, P.O. Box: 9.
- **Office address:** 1055 Budapest, Falk Miksa Street 9-11.
- **Phone:** +36 (1) 391-1400
- **Email:** ugyfelszolgalat@naih.hu
- **Website:** www.naih.hu

In addition to—or instead of—filing a complaint with the supervisory authority, you also have the right to seek legal remedy before a court to protect your rights. The lawsuit may be filed—at your choice—before the competent court based on your residence or place of stay.