

Cookie Policy

I. GENERAL INFORMATION ABOUT COOKIES AND THE PURPOSE OF DATA PROCESSING

The purpose of using cookies is to speed up the use of the website, balance server load, or assist and simplify the use of the website through automation. Cookies are files or pieces of information sent to the visitor's web browser by the web server accessed by the visitor's device.

A cookie generally contains the name of the website it came from, its value (a randomly generated unique number), and its lifespan — i.e., how long it remains on the User's device. Cookies are stored in a file on the User's device's storage. The contents of the file can be queried at any time by the web server that sent the cookie.

Purpose of data processing: identifying Users, distinguishing Users, identifying User sessions, storing data entered there, and tracking associated with User identification.

Legal basis for data processing: based on the voluntary consent of the data subject (hereinafter referred to as the "User")

Scope of this policy: the Users of the website.

II. TYPES OF COOKIES

1. Essential session cookies (technical/necessary cookies):

These are indispensable for navigating the website, ensuring key functions, and accessing protected content. Such cookies do not collect information for marketing or track the visitor across websites. They are automatically deleted when the browser is closed, and the session ends. If the visitor does not accept these cookies, parts of the site may not function properly. These cookies may be lawfully used without the User's consent.

2. Statistical cookies (technical/functional cookies):

These cookies relate to the performance and development of the website, as well as to enhancing the User experience. They enable the website operator to collect information about how Users interact with the site. The information collected may include details such as which parts of the website visitors click on, how many pages they view, the duration of individual sessions, and any error messages received. Among statistical cookies, a distinction is made between persistent and

session cookies, depending on how long they are stored in the visitor's browser or device. Statistical cookies are placed on the User's device while browsing the website. They can later be deleted through the browser settings, and the User's consent is required for their use.

3. **Advertising cookies (third-party/functional cookies):**

The purpose of these cookies is to display advertisements that are relevant to the individual visitor on the website. These cookies collect information such as which pages the visitor has viewed, which parts of the website they clicked on, and how many websites they have visited, in order to display content that may be of interest to them. As a general rule, the placement of advertising cookies requires the User's consent.

Advertising cookies may include:

- **Meta (Facebook, Instagram) cookies:**

More information about cookies placed by **Meta (Facebook and Instagram)** is available at <https://www.facebook.com/policies/cookies/> where you can also find details on how to disable cookies.

- **Google Analytics cookies:**

Google Analytics is an analytics service provided by Google Inc. ("Google"). Google Analytics uses cookies stored on the User's computer to analyze User interactions that occur on the website. The legal basis for processing data for web analytics purposes is the voluntary consent of the website User. Analytical cookies collect anonymized and aggregated data, which makes it difficult to identify the User's computer; however, such identification cannot be completely excluded.

Analytical information collected by Google Analytics cookies is transmitted to and stored on Google's servers. Google processes this information on behalf of the Data Controller in order to evaluate Users' website usage patterns, compile reports on website activity, and provide other services related to website usage to the Data Controller. Within the framework of the Google Analytics service, the IP address transmitted by the browser is not associated by Google with any other data. Google Analytics uses analytical cookies. Further information about the cookies used by Google Analytics can be found at the following link: <https://policies.google.com>

- **Google Ads cookies:**

The website uses Google Ads (AdWords) remarketing tracking codes. This allows visitors to the website to be later reached with remarketing advertisements on websites within the Google Display Network. The

remarketing code uses cookies to tag visitors. Users of the website can disable these cookies by visiting the Google Ads Settings Manager and following the instructions provided there. After doing so, they will no longer receive personalized offers from the Service Provider. Further information about the cookies used by Google can be found at the following link:

<https://policies.google.com/technologies/ads>

- **Emarsys cookies:**

The Web Extend JavaScript commands collect and store website browsing behavior in our own database for an unlimited period of time. However, this data is always anonymous or pseudonymized, and cannot be exploited by any third party in the event of a security breach. In the absence of additional identification measures, the processing of such data is not restricted by the GDPR.

4. Social media cookies (third-party/functional cookies):

The purpose of these cookies is to provide the social media services used on the website for the visitor, for example, when the visitor shares content from the website on Facebook, X (formerly Twitter), or another social media platform, when they link their account with social media content, or when content stored by a social media service provider appears on the website through plug-ins (add-on programs) provided by that service provider. Social media service providers may collect data through these cookies about how the visitor uses the social media services they provide and what content the visitor shares, in order to display content that may be of interest to the visitor. Therefore, the User's consent is required for the operation of these cookies.

Information about the cookies placed on the website can be found at the following links:

- **Google:** <https://support.google.com/analytics/answer/7667196?hl=en>
- **Meta:** <https://www.facebook.com/policies/cookies/>
- **TikTok:** <https://www.tiktok.com/legal/tiktok-website-cookies-policy?lang=en>
- **Pinterest:** <https://policy.pinterest.com/en/cookies>
- **YouTube:** https://www.youtube.com/intl/ALL_en/howyoutubeworks/User-settings/privacy/
- **X (Twitter):** <https://help.twitter.com/en/rules-and-policies/twitter-cookies>

5. Other third-party external cookies (third-party/convenience cookies):

In addition to the above, operators of other services that are not in a contractual relationship with the operator of the given website may also place cookies on the website independently of the website operator, for the purposes of their own operations. Such cookies refer to those belonging to a domain other than the one appearing in the browser's address bar of the website visited by the User, regardless of any consideration as to whether that organization qualifies as an independent data controller.

Type of Data Processed:

Technical data (depending on the specific cookie, but at most) from the User, including:

- Domain name
- Date and time of the visit
- HTTP response code
- Pages visited
- Individual page settings
- Operating system and its version number
- Browser and its version number
- Screen resolution

The above data are automatically logged by the Website.

Duration of Data Processing:

The duration of data processing depends on the specific cookie, calculated from the time of logging. However, under no circumstances shall the duration of data processing exceed five (5) years from the time of logging.

III. MANAGING COOKIES

Most internet browsers are set to accept cookies by default. The available options depend on the browser and operating system used. Each browser provides the possibility to manage cookies in its settings. Information on how to do this can be found in the browser's help menu and at the links below, which contain detailed guidance on the available settings.

- Internet Explorer: <https://support.microsoft.com/en-us/windows/manage-cookies-in-microsoft-edge-view-allow-block-delete-and-use-168dab11-0753-043d-7c16-ed5947fc64d>
- Microsoft Edge: <https://support.microsoft.com/en-us/microsoft-edge>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: <https://support.apple.com/en-us/HT201265>
- Opera: <http://help.opera.com/Windows/10.20/hu/cookies.html>

IV. DELETION OF COOKIES

The User has the right to delete cookies from their own computer or to disable the use of cookies in their browser. Cookie management is generally available in the Tools/Settings menu of browsers, under Privacy/History/Custom Settings, usually labeled as cookies, tracking, or similar. However, the Data Controller draws attention to the fact that the process for deleting cookies may vary depending on the browser used.

The use of cookies does not involve the collection, processing, or use of personal data for the purpose of identifying the User. The data collected in this manner are not suitable for identifying the User.

V. LEGAL BASIS FOR THE PROCESSING OF COOKIES

1. The legal basis for the processing of essential session (session-ID) cookies (Section III.1) is Article 6(1)(e) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (General Data Protection Regulation), as well as Section 9(1) point 2 of Government Decree No. 182/2022 (V.24.) on the duties and powers of members of the Government.
2. The legal basis for the processing of statistical and advertising cookies, as well as social media and other third-party cookies (Sections III.2–5), is Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), i.e., the consent of the User.

In practice, this consent is given by the User when pressing the “Allow” button in the pop-up window displayed at the bottom of the website upon visiting it.

VI. RIGHTS OF THE USER

In relation to technical cookies:

The User is entitled, in connection with technical cookies, to exercise the rights of access, rectification, erasure, restriction of processing, and objection. Further details on these rights can be found in Section 3 of the Data Protection Notice below.

In relation to third-party cookies:

The User is entitled, in connection with third-party cookies, to exercise the rights of access, rectification, erasure, restriction of processing, data portability, and

withdrawal of consent. Further information on these rights is available in Section 3 of the Privacy Policy.

VII. ENFORCEMENT, COMPLAINT, AND REMEDY OPTIONS

In the event of any infringement related to the processing of their personal data, or in order to exercise their rights, the User may avail themselves of the options described in detail in Sections 3 and 4 of the Privacy Policy.