

**Neumann Lapkiadó és Kommunikációs
Korlátolt Felelősségű Társaság**

PRIVACY POLICY
FOR THE VISITORS ON [HTTPS://EURSIAMAGAZINE.COM/](https://eurasiamagazine.com/)

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II. Purpose of this Disclaimer

- (1) In this document, we wish to inform individuals visiting the <https://eurasiamagazine.com/> website (hereinafter referred to as "Data Subjects") about the details of the processing of their personal data, in compliance with our obligations set out in the European Parliament and Council Regulation (EU) 2016/679 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 (hereinafter referred to as "GDPR").

III. Data Handler Information

Name: Neumann Lapkiadó és Kommunikációs Korlátolt Felelősségű Társaság
Headquarters: 1117 Budapest, Infopark sétány 1.
Legal Representative: Levente Horváth, CEO
Company reg. number: 01-09-405818
Tax number: 32084366-2-43
Registered by: Fővárosi Törvényszék Cégbírósága
E-mail: info@eurasiamagazine.com

IV. Data Processing Activities

(1) Contact

Description of activity: Anyone can contact us via email, and anyone is entitled to send us a message. In this context, we process the following data:

Data Subjects:	Any person who contacts us by email or who sends us a message.
Purpose of Data Processing:	Making contact or maintaining communication.
Legal Basis for Data Processing:	Your voluntary consent (GDPR Article 6(1)(a)). By sending the message, you give your consent for the processing of personal data contained in the email or the message. You are entitled to withdraw your consent at any time.
Scope of Data Processed:	Email address and any other personal data described in the email or the message.
Duration of Personal Data Storage:	Personal data is processed until the purpose of data processing is realized, but for no more than 6 months from the date of making contact.
Recipients:	We do not transmit your personal data to third parties.

(2) Record of measures related to the exercise of data subject rights

Activity Description: In order to fulfill our legal obligations, we maintain a record of the exercise of rights entitled to the data subject under data protection regulations and of the measures taken based on those rights. The rights of the data subject related to the processing of their personal data are contained in Point VI of this data protection notice.

Data Subjects:	those individuals who exercise a data subject right.
Purpose of Data Processing:	compliance with data protection obligations and ensuring accountability.
Legal Basis for Data Processing:	Fulfillment of a legal obligation pertaining to the data controller [GDPR Article 6 (1) c); GDPR Article 5 (2) and Article 12]. The data processing is not voluntary and is independent of the data subject's will.
Scope of Data Processed:	Name, contact information, subject of the submission, personal data conveyed in the submission, the date and method of action taken, the content of the action, the content of the request and the date of its response.
Duration of Personal Data Storage:	5 years from the date of sending the response to the submission, followed by an additional 6 months.
Source of Personal Data:	the data subject and/or their representative.
Consequence of failing to provide data:	The identity of the inquirer cannot be identified, so they cannot receive an answer to their query.
Recipients:	We do not transfer personal data to third parties.

(3) **Use of Cookies on the <https://eurasiamagazine.com/> website**

What is a cookie?

A cookie is a small text box stored on the hard drive of a visitor's computer or smartphone by the website. Cookies allow the website to remember the actions taken by the visitor and their personalized settings (such as the information provided when checking the user's age or language settings), so the user doesn't have to provide this data every time they visit the website or navigate to another page on the site.

We only use cookies that are absolutely necessary for the website to operate, which support sessions and identify individual user sessions. We also use cookies that make our website more convenient to use.

What cookies do we use on the <https://eurasiamagazine.com/> website?

1.) Strictly necessary cookies

These cookies are essential for us to provide a functioning website for you. They don't store personal information and cannot be disabled. Without them, the website wouldn't function.

Website - Session ID (PHPSESSID)

- **Data subjects:** visitors of the <https://eurasiamagazine.com/> website.
- **Type of data processed:** randomly generated code.

- **Purpose of data processing:** This cookie stores the action of closing the information and age-verification page. If this cookie is already present on the user's hard drive, the landing page will not appear again.
- **Legal basis for processing:** legitimate interest of the data controller (GDPR Article 6 (1) f)).
- **Duration of data processing:** stored until the end of the session
- **Method of data processing:** electronic

Website - Pop-up window on certain pages (modal_eurasia)

- **Data subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** the value "true"
- **Purpose of data processing:** if the website administrators set a pop-up informational window on a certain page, this cookie stores the fact that this window should appear before the user.
- **Legal basis for processing:** legitimate interest of the data controller (GDPR Article 6 (1) f)).
- **Duration of data processing:** 1 day
- **Method of data processing:** electronic

2.) Convenience Cookies

These cookies allow the website to remember which mode of operation you have chosen (for example: whether you have accepted the cookie information and in what order the results appear in the search results list). This is done in a way that the next time you visit, you won't have to repeatedly accept the cookie information or set the sorting principle by which you'd like to view the content displayed on the site. Without the information stored in the setting cookies, our website operates less smoothly.

Website – Cookies permitted by the user (cookieGA, cookiepolicy_eurasia)

- **Data subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** "yes/no" value
- **Purpose of data processing:** to store the user's cookie settings.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6 (1) a)).
- **Duration of data processing:** 1 year
- **Method of data processing:** electronic
- **Location of electronic storage:** Microsoft Corporation

3) Third-party cookies (analytical cookies)

The following services by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”) are active on the website: Google Analytics.

These third-party cookies on our website allow us to track the number of visitors. They help us identify the most popular pages and analyze the behavior of our visitors.

All data collected by these cookies are anonymous. If the user does not enable these cookies, we cannot determine if the user has visited our website or not, and we cannot measure the performance of our website. To access settings for third-party cookies, [click here](#).

Google Analytics: **_ga** cookie

- **Subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** randomly generated number. Google Analytics: client identifier to recognize visitors.
- **Purpose of data processing:** Google Analytics uses cookies to distinguish between new and returning visitors and to monitor website traffic.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6(1) a)).
- **Duration of data processing:** 2 years
- **Method of data processing:** electronic
- **Electronic storage location:** Google

Google Analytics: **_gid** cookie

- **Subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** randomly generated number. Google Analytics: session identifier.
- **Purpose of data processing:** measuring interactions of visitors from opening to closing the website.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6(1) a)).
- **Duration of data processing:** 2 years
- **Method of data processing:** electronic
- **Electronic storage location:** Google

Google Analytics: **_gat**

- **Subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** randomly generated number.
- **Purpose of data processing:** Limits the number of requests to Google Analytics software, such as traffic data, clicks, time spent on the site, etc.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6(1) a)).
- **Duration of data processing:** 2 years
- **Method of data processing:** electronic
- **Electronic storage location:** Google

Google Analytics: **_utma**

- **Subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** randomly generated number. Google Analytics software's unique visitor identifier.
- **Purpose of data processing:** Tracking how many times a visitor has been on the site, when was their first and last visit.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6(1) a)).
- **Duration of data processing:** 2 years
- **Method of data processing:** electronic
- **Electronic storage location:** Google

Google Analytics: **_utmb, _utmz**

- **Subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** timestamp.

- **Purpose of data processing:** Google Analytics software uses cookies to measure the duration of individual visits.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6(1) a)).
- **Duration of data processing:** 2 years
- **Method of data processing:** electronic
- **Electronic storage location:** Google

Google Analytics: `_utmz`

- **Subjects:** visitors of the <https://eurasiamagazine.com/> website
- **Type of data processed:** encoded identifiers.
- **Purpose of data processing:** Google Analytics software uses cookies to store the path through which the visitor reached the website, e.g., the browser and search quotes.
- **Legal basis for processing:** the visitor's consent (GDPR Article 6(1) a)).
- **Duration of data processing:** 2 years
- **Method of data processing:** electronic
- **Electronic storage location:** Google

For more information about Google Analytics cookies, [click here](#).

If you have questions about the use of cookies, please contact us at info@eurasiamagazine.com.

For additional information about cookies, please visit the following website for useful information: <http://www.allaboutcookies.org>.

V. Data processors utilized by the Data Controller:

The data controller does not use data processors.

VI. Rights of the Data Subject regarding data processing

(1) How can you exercise your rights?

For requests, questions, and complaints, you can contact our representative directly at the following contact details:

Name: Levente Horváth, CEO

E-mail: info@eurasiamagazine.com

You can exercise your rights regarding data processing by submitting a request to us. We respond immediately to any inquiry made to any of our contact methods, but no later than one month.

For requests related to data processing rights, you can submit in writing or electronically to the following contact details: **1117 Budapest, Infopark sétány 1., info@eurasiamagazine.com**

Please, whenever possible, contact us electronically. Whenever possible, we will respond to data protection requests electronically, unless you expressly request another form of communication, or we do not know your electronic contact details or for data protection reasons we deem it necessary to verify the identity of the requester.

We decide on the request without undue delay, no later than one month from its receipt, and inform you of the measures taken following the request, or if no action is taken, the reason for it, the opportunity to submit a complaint to the supervisory authority, and the possibility of judicial remedies.

The deadline for action can be extended by an additional two months if necessary, taking into account the complexity of the request and the number of requests. We will inform you of the extension of the deadline, stating the reasons, within one month from the receipt of the request.

If your request is clearly unfounded or excessive, we may charge a fee or refuse to act. If the request for the release of data incurs disproportionate additional costs for us (e.g., due to the chosen format), we are entitled to charge you for the costs related to the release of data. We will inform you in advance about any costs incurred. We make our decisions based on the legal basis of data processing when assessing requests. You are entitled to exercise your rights regarding data processing as follows:

	Consent	Contract performance	Legal obligation	Legitimate interest
request for information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
request for correction	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
restriction	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
deletion	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
objection				<input checked="" type="checkbox"/>
data portability	<input checked="" type="checkbox"/>			
withdrawal of consent	<input checked="" type="checkbox"/>			
right to lodge a complaint	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
right to legal remedy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(2) Right to access

Under this right, you can request information about the personal data we process about you, as well as the circumstances related to data processing, particularly but not exclusively about the purpose of the data processing, the duration of the data storage, the recipients of the data in case of transmission, and the details of automated decision-making.

(3) Right to rectification

If we process your personal data inaccurately, either due to our fault or otherwise, under this right, you can request the rectification of the data we process about you, if the purpose of data processing allows for the supplementation of your incomplete data.

(4) Right to deletion

You can request the deletion of your personal data if one of the following conditions exists:

- a) Your personal data is no longer necessary for the purpose of the data processing;

- b) If the data processing was based on your consent, you withdraw that consent, provided that there is no other legal basis for the data processing;
- c) You object to the processing of your personal data;
- d) Your personal data was processed unlawfully;
- e) A law requires us to delete your personal data;
- f) Your personal data was collected in relation to the offer of information society services before you became of age.

However, we cannot comply with your request for deletion of personal data in the following cases:

- a) Data processing is necessary for the freedom of expression or information of others;
- b) A law requires us to process the data;
- c) Data processing is necessary for public health purposes;
- d) Data processing is necessary for archival, scientific, historical research, or statistical purposes;
- e) Data processing is necessary for the establishment, exercise, or defense of legal claims.

(5) Right to restriction of processing

You can request the restriction of processing of your data if:

- a) a) You contest the accuracy of the personal data – in this case, the restriction applies for the duration of the verification of data accuracy;
- b) Your personal data was processed unlawfully, but instead of erasing them, you request restriction;
- c) We no longer need your personal data for processing purposes, but you expressly request their retention for the establishment, exercise, or defense of legal claims;
- d) You object to the processing of your personal data – in this case, the restriction applies for the duration until a decision is made regarding the objection.

If, based on your request, we restrict the processing of your personal data, we will inform you in advance about lifting the restriction. During the restriction, we will not process your personal data in any other way except for their storage, unless one of the following conditions exists:

- a) You gave consent for the processing;
- b) The data processing is necessary for the establishment, exercise, or defense of legal claims;
- c) The data processing is necessary for reasons of significant public interest.

(6) Right to object

If we process your personal data based on our legitimate interest or the legitimate interest of a third party, or if we process them in the course of performing a public task, you can

object to the data processing at any time. If you object, we will cease the data processing unless one of the following conditions exists:

- a) The data processing is justified by compelling legitimate reasons;
- b) The processing of data for archival, scientific, historical research, or statistical purposes is necessary for reasons of public interest.

(7) Right to data portability

If your personal data is processed based on your consent or for the performance of a contract with you in an automated manner, you can request that the personal data you provided to us be returned to you or transmitted to another data controller in a structured, commonly used, machine-readable format

- a) Returned to you, or
- b) Allow for its transmission without hindrance to another data controller, or
- c) If technically feasible, transmitted directly to another data controller designated by you.

However, we cannot comply with your request if one of the following conditions exists:

- a) Data processing is necessary for reasons of significant public interest;
- b) Fulfilling the request would adversely affect the rights of others.

(8) Right to withdraw consent

If we process your personal data based on your consent, you have the right to withdraw that consent at any time. In the case of withdrawal of consent, we will cease the data processing and delete your personal data unless there's another legal basis for the processing.

The withdrawal of consent will have no consequences for you. However, the withdrawal of consent does not affect the legality of data processing based on consent before its withdrawal.

(9) Right to lodge a complaint

Please contact us with any questions, objections, or complaints related to data processing (see section III of this notice).

If you believe that the processing of your personal data does not comply with the applicable legal requirements, you can submit a complaint to the data protection authority of any EU Member State.

In Hungary, the data protection authority is the National Data Protection and Freedom of Information Authority. Their contact details are as follows:

Mailing address: 1363 Budapest, Pf.: 9.

Headquarters: 1125 Budapest, Falk Miksa utca 9-11.

Phone: +36 (1) 391-1400, +36 (30) 683-5969, +36 (30) 549-6838

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>

(10) Initiating Legal Proceedings

You may also enforce your rights through the courts. The conduct of litigation falls within the jurisdiction of the court, with the Metropolitan Court being competent for the trial. The lawsuit can also be initiated at the court of your place of residence or domicile (the contact details of the courts can be found at the following link: <http://birosag.hu/torvenyszekek>).