

# Privacy notice

## 1. Identification of the data controller and the data processing interfaces

1.1 We inform you that the interfaces involved in the data management are

### **BUBBLES International Private Limited Company**

Company registration number: 08-10-001871 - Court of Registration of the Győr General Court

Tax number: 24786922-2-08

Headquarters: 9027 Győr, Kandó Kálmán utca 11-13.

Website: <https://www.bubbles.hu/>

E-mail: [info@bubbles.hu](mailto:info@bubbles.hu)

(hereinafter referred to as the "Data Controller").

1.2. Areas of data processing:

- websites: <https://www.bubbles.hu> and <https://my.bubbles.hu>
- Bubbles laundry mobile app developed for Android and IOS operating systems
- Bubbles self-service laundry network in-store pay station

## 2. Hungarian law clause, scope of this prospectus

2.1 The service provided by the above Data Controller (hereinafter referred to as the "Data Controller"), which operates the interfaces (hereinafter referred to as the "Interfaces") concerned by the data management as set out above, is directed to and provided from Hungary. Accordingly, the provision of the service and the Users in the course of using the service (including the data management) shall be governed by Hungarian law. The Data Controller shall use the Users' data primarily for the purposes of

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR, General Data Protection Regulation)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.),
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (Act on electronic commerce services),

- research and mediation 1995 on the processing of name and address data for the purposes of research and direct marketing (Act CXIX of 1995 on the processing of name and address data for the purposes of research and direct marketing (DMtv.),

- and Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Commercial Advertising (Act XLVIII of 2008)

on the basis of the provisions of.

2.2 The scope of this notice applies to the use of the above-listed areas concerned by data processing and the processing of data carried out in the course of using the services made available there.

2.3. For the purposes of this notice, User means: a natural person browsing and/or downloading and/or accessing the platforms concerned by the data management, regardless of the service or any service he/she uses on the platforms concerned.

### **3. Legal basis for processing: consent of the data subject**

3.1 The legal basis for data processing by the Data Controller is the consent of the User pursuant to Article 6 (1) (a) of the GDPR and Article 5 (1) (b) of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: the "Information Act").

3.2 The User gives his/her consent by ticking the checkbox in front of the privacy statement.

### **4. Processing without the data subject's further specific consent or following the withdrawal of consent**

4.1. The Data Controller may process the data recorded with the consent of the User concerned without the further separate consent of the User concerned, or after the withdrawal of consent pursuant to Section 6 (5) of the Data Protection Act, as follows.

4.2 If the personal data have been collected with the consent of the User concerned, the Data Controller may process the collected data without the further specific consent of the User concerned, unless otherwise provided by law, and even after the withdrawal of the consent of the User concerned in the following cases:

- to comply with a legal obligation to which the Data Controller is subject, or

- for the purposes of the legitimate interests pursued by the Controller or by a third party, where such interests are proportionate to the restriction of the right to the protection of personal data.

4.3 Before starting the processing on the basis of the above legitimate interest, the Data Controller shall in any case - as a mandatory requirement - carry out the so-called interest balancing test. The balancing of interests test is a three-step process during which the Data Controller identifies the legitimate interest and the countervailing interest of the User concerned and the fundamental right affected by the envisaged processing. Finally, based on the completion of the weighing, the Data Controller determines whether the personal data can be processed pursuant to Article 6(5) of the Information Act.

4.4 The Data Controller shall inform the User concerned of the result of the balancing of interests test in such a way that the User can clearly identify the legitimate interest and the reasons why the processing of his or her personal data by the Data Controller without his or her consent is a proportionate restriction.

4.5. When carrying out the balancing of interests test, the Data Controller shall act in accordance with the provisions of Opinion No 6/2014 of the Working Party on the Protection of Individuals with regard to the Processing of Personal Data of the Council of the European Union, which contains the relevant findings. The Opinion is available at the following link: [http://ec.europa.eu/justice/data-protection/article-29/documentation/opinion-recommendation/files/2014/wp217\\_hu.pdf#h2-2](http://ec.europa.eu/justice/data-protection/article-29/documentation/opinion-recommendation/files/2014/wp217_hu.pdf#h2-2)

## **5. Other possible legal grounds for processing based on law**

5.1. 5(1)(b) of the GDPR. In certain cases, the controller may be obliged to carry out mandatory processing required by law or other legislation. In addition, the Data Controller is obliged to comply with any requests from public authorities which may also involve the processing and transmission of personal data, which is also a statutory obligation of the Data Controller.

5.2 Pursuant to Article 6(1)(f) of the GDPR, we further inform you that the Controller may also process your personal data if the processing is necessary for the purposes of the legitimate interests pursued by the Controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the User which require the protection of personal data, in particular where the data subject is a child.

Before starting the processing on the basis of the above legitimate interest, the Data Controller shall in any case - as a mandatory requirement - carry out the so-called interest balancing test as described in sections 4.3. to 4.5. of this notice.

5.3 The services provided by the Data Controller are considered as other commercial services within the meaning of the Act.

For the purposes of monitoring the performance of its service, billing of the fees arising from it and the enforcement of claims related thereto, the Data Controller may process the natural person identification data and address necessary to identify the user (User), as well as data relating to the time, duration and place of use of the service.

The Controller may process personal data that are technically necessary for the provision of the service. The Data Controller shall, other things being equal, choose and in any case operate the means used to provide the service in such a way that personal data are processed only to the extent strictly necessary for the provision of the service and for the fulfilment of the other purposes set out in this Act, but only to the extent and for the duration necessary (Further rules on technically necessary processing are set out in the "[Information on the use of cookies](#)" and in Chapter 6 of this Notice.)

The Data Controller may process data relating to the use of the service for any purpose other than those set out above, in particular to increase the effectiveness of its service, to deliver electronic advertising or other targeted content to the user, for market research purposes, only with the prior specification of the purpose of the processing and with the consent of the user.

## **6. Data processing related to the provision of an IT service**

6.1.Data subjects: all Users visiting the [www.bubbles.hu](http://www.bubbles.hu) and [www.my.bubbles.hu](http://www.my.bubbles.hu) websites and the mobile application of Bubbles Laundry developed for the IOS and Android operating systems, regardless of the use of the services available on the given interface.

6.2 Legal basis for data processing: article 6 (1) (a) of the GDPR and the Infotv. Article 5(1)(a) of the GDPR. The User gives his/her voluntary consent to the processing of personal data by accepting the information and declaration that pops up when he/she starts browsing the website or by continuing to browse the website.

6.3.Definition of the scope of the data processed: the information technology processing concerns the scope of data necessary for the functioning of the "cookies" used for the operation of the website and the use of the log files used by the web hosting provider.

Data processed to enable user-friendly browsing:

- the web pages visited during your visit to the website and the order in which they are opened
- IP address of the device used by the user.

Scope of data processed to measure the number of visits to the website:

- the web pages visited during your visit to the website and the order in which they are opened

- the frequency of visits to individual web pages on the site
- from which other website the User came to this website (only for websites with a link to this website)
- determine the geographical location of the User visiting the website (based on the ISP's data, only approximate data on the location of the browsing device)
- the time you started browsing the site
- the time you leave the website (end your browsing)
- the duration of your browsing of the website.

Data processed to verify access to the website:

- User name and PIN (may be stored at the User's discretion)
- User e-mail address
- IP address of the device used by the user.

6. 4. Purpose of processing: The use of "cookies" and log files is necessary for the user-friendly and secure operation of the website. The purpose of the processing of data through the use of cookies and "cookies" is to ensure the user-friendly operation of the website for the User concerned and to collect anonymous data about the use of the website.

Including:

- Identification of the browsing device used by the user, storage of identification data - until the time of browsing - based on the IP address. This makes browsing smoother, without which the User would have to identify himself or repeat processes for each page visited.

The data required for the following purposes is collected anonymously and cannot be linked to an individual:

- Measuring the number of visits to the website, the frequency with which each page of the website is viewed and the browsing time of each page of the website in order to enable the Data Controller to tailor the website to the maximum extent possible to the needs of the Users.
- Determining the location of the User (browsing device), mapping the level of interest in the Data Controller's service by territory.

- Identification of the website from which the User has come to this website in order to learn about other topics of interest to Users interested in the Controller's service and to measure the effectiveness of the activity promoting the Controller's service.

To measure this data, the Controller's IT system uses the tools of Google Analytics (Alphabet Inc.). When you visit pages using Google Analytics, Google cookies remember the preferences and information indicated by the user, which also means that anonymous data is collected to measure the number of visits to the website and to map browsing habits.

The above anonymous data is also accessed by Alphabet Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA), the owner and operator of the Google Analytics tools. Alphabet Inc. also uses the above data to deliver targeted advertising to the browser user, in addition to the aforementioned analytics. Alphabet Inc. does this by combining the anonymous data with the IP address of the browsing device used to determine the discoverable interests based on the browsing patterns from that device, and then delivers targeted advertising to that device. Alphabet Inc. does not have access to any data other than the anonymous data described in this section.

The cookies (facebook button, facebook share button, facebook like button) that facilitate the visit of the Facebook social networking site and the sharing and liking of this website on the social networking site are provided by Meta Platforms Inc., so that the anonymous data processed by these cookies is also accessible by Meta Platforms Inc. (1601 Willow Road, Menlo Park, CA 94025, USA).

The cookies (Instagram button) that facilitate the visit of the social networking site Instagram by the data controller are provided by Instagram LLC., so that the anonymous data processed by these cookies is also accessed by Instagram LLC. (1 Hacker Way, Menlo Park, CA 94025, USA). Instagram LLC. is owned by Meta Platforms Inc. and the Instagram service is operated by Meta Platforms Inc., so the data processing that takes place when using the service is carried out jointly by Meta Platforms Inc. and Instagram LLC.

Through these services, Meta Platforms Inc. and Instagram LLC. therefore have access to the anonymous data described above, which are processed to measure website traffic and to map browsing habits. Meta Platforms Inc. and Instagram LLC. also use the above data to deliver targeted advertising to the browsing user, in addition to the aforementioned analyses. In doing so, Meta Platforms Inc. and Instagram LLC. will determine the discoverable interests based on the browsing habits of the device by combining the anonymous data with the IP address of the browsing device used to browse and deliver targeted advertisements to that device. Meta Platforms Inc. and Instagram LLC. do not have access to any data other than the anonymous data described in this section.

The following data are collected in a way that can be linked to the User's person, but only the Data Controller has access to them:

- Possible storage of user name and password for easier access (at User's discretion)
- Verify user access rights (user name, e-mail address, password).

A data necessary to ensure the user-friendliness of the website (IP address, the sequence of pages visited on the website during browsing) are recorded for the duration of the browsing session (i.e. the duration of browsing the website) and are deleted once the session is over. The processing of such data is carried out by the Data Controller's own IT system and is not accessible to third parties, except in the case of IT processing (see below under "Use of a data processor").

A data necessary to verify access and grant usage rights are stored for the duration of the browsing session (i.e. the duration of your browsing session) and are deleted once the session is over. The processing of such data is carried out by the Data Controller's own IT system and is not accessible to third parties, except in the case of IT processing (see below under "Use of a data processor").

A user name and password may be stored permanently at the User's discretion, this is stored by cookies on the User's device, and the User can delete them in his browser settings, thus controlling the time of data storage.

A the data used as a basis for measuring the number of visits and for mapping the patterns of use of the website are recorded anonymously from the outset by the Data Controller's IT system and cannot be linked to any individual. The Controller's IT system uses Google Analytics to measure this data. This data is stored by the Data Controller permanently, but for a maximum of 2 years, by means of cookies, which are stored on the User's browsing device. The User can delete these cookies at any time by changing the settings of his browser.

Anonymized data processed to facilitate the visit of the social networking sites of the Data Controller and the sharing and liking of this website on the social networking site , also accessible by Meta Platforms Inc., which provides cookies to measure the number of visits to the site and to map browsing habits, are permanently stored by Meta Platforms Inc.'s tools, but for a maximum of 2 years, using cookies that are stored on the User's browsing device. The User can delete these cookies at any time by changing the settings of his browser.

6.6.Method of storage of data: in separate processing lists in the IT system of the Data Controller, anonymously. Data necessary to ensure the user-friendliness of the website (IP address, order of pages visited on the website during browsing) are not stored. Cookies that provide data are stored locally on the User's device. Log files used by the web hosting provider are stored on the hosting provider's server.

6.7 For more information on the information technology data processing process and the information technology data processing using Google Analytics and Meta Platforms Inc. tools, please refer to the information available from the warning bar that pops up when you start browsing the website, the information available by clicking on the "[Information on the use of \"cookies\"](#)" on the website, and the pages of Google Analytics [https://www.google.com/intl/hu\\_ALL/analytics/support](https://www.google.com/intl/hu_ALL/analytics/support) and Meta Platforms Inc. <https://developers.facebook.com/products>. The Data Controller makes use of only those features offered by Google Analytics and Meta Platforms Inc.

## **7. Processing of data related to the receipt and reply to a message**

7.1 Definition of the scope of the data processed when using the messaging platform to register interest in a franchise business opportunity.

Data subjects: users who send messages to the Data Controller using the messaging interface available from the "We are waiting for your application" section of the [www.bubbles.hu/franchise](http://www.bubbles.hu/franchise) sub-site or by sending an e-mail to the e-mail address(es) indicated on the website.

7.2. Legal basis for data processing: article 6 (1) (a) of the GDPR and the Infotv. Article 5(1)(a) of the GDPR. By voluntarily providing the data requested in the messaging interface, by ticking the checkbox in front of the data processing statement and by voluntarily sending the message, or in the case of a message sent by e-mail, by voluntarily sending the e-mail, the User consents to the processing of the data provided and, where applicable, of any other data included in the message.

7.3. Definition of the scope of the data processed: in the case of messaging users, the data processing concerns the scope of the personal data and contact details to be filled in on the messaging interface referred to above, as well as any additional data that the User may provide in the message (including the e-mail message).

Scope of the data:

- Surname
- first name
- City
- e-mail address
- phone number.

A With regard to any additional data provided by the User in the message (e-mail), the Data Controller will only process the data in relation to the content of the message sent, but the Data Controller will not ask the User to provide any personal data that may be provided there. When such unexpected personal data is provided, the Data Controller shall not store the unexpected personal data and shall delete it from its IT system without delay.

7.4. Purpose of processing: to enable the User to exchange messages with the Data Controller. The purpose of the processing of the personal data and contact details voluntarily provided by the User visiting the website, as indicated above, is to enable the User concerned to use the website's messaging services.

7.5. General complaints and other requests for information about the service can be made via the e-mail address indicated in the interfaces concerned by the data management. The scope of the data processed when lodging a general complaint or requesting other information about the service is defined as the personal data provided by the User in the message (e-mail) and any additional data provided.

Scope of the data:

- Surname
- first name
- e-mail address

A With regard to any additional data provided by the User in the message (e-mail), the Data Controller will only process the data in relation to the content of the message sent, but the Data Controller will not ask the User to provide any personal data that may be provided there. When such unexpected personal data is provided, the Data Controller shall not store the unexpected personal data and shall delete it from its IT system without delay.

7.6 Method of storage of the data: in a separate data management list in the IT system of the Data Controller, until the end of the information exchange period.

## **8. Data processing related to marketing enquiries (newsletter, SMS, telephone, market research, other)**

8.1.Data subject: the User who gives his consent to be contacted by the Data Controller for marketing purposes by ticking the relevant box on one of the interfaces involved in the data processing.

8.2. Legal basis for data processing: article 6 (1) (a) of the GDPR and the Infotv. Article 5(1)(a) of the GDPR and Article 5(1)(a) of the GDPR. Article 6(1) and (2) of the GDPR. Voluntary consent is given by the User by accepting this Privacy Policy and by ticking the box for consent to marketing enquiries. By doing so, the User declares that he or she consents to the processing of his or her data as set out in the data management information and to its use for marketing purposes.

In addition to sending useful information, the newsletter service also aims at direct marketing by the Data Controller. The use of this service is voluntary and based on the User's decision after having been duly informed. If the User does not consent to the processing for marketing purposes, this will not affect his/her use of the areas concerned by the processing and his/her access to further services. The Controller does not make the use of its direct marketing service a condition for the use of any of its other services.

8.3. Definition of the scope of the data processed:

- Surname
- first name
- e-mail address.

8.4 Purpose of processing: messages sent by the Data Controller to the User for marketing purposes (e-mail, SMS, telephone, market research, other).

8.5. Method of storage of data: in a separate processing list in the IT system of the Data Controller.

8.6 By registering, you acknowledge that we may send you system messages such as: balance top-up, password reminder, balance reset, data update message.

## **9. Registration-related data processing**

9.1.Data subjects: users registering on one of the interfaces involved in data management.

9.2. Legal basis for data processing: article 6 (1) (a) of the GDPR and the Infotv. Article 5(1)(a) of the GDPR. Voluntary consent is given by the User by completing the data form that appears during the registration process on the interfaces involved in the data processing and by ticking the checkbox in front of the data processing statement, and finally by submitting the registration.

9.3.Definition of the scope of the data processed: in the case of registrants, the data processing concerns the personal data and contact details provided during registration or, in the case where the registrant uses a third party service for access, the personal data provided by the third party and necessary for access.

Scope of the data:

Data required for registration:

- Last name -, and first name
- username
- phone number
- e-mail address
- year of birth

9.4 Purpose of data processing: data processing related to the operation of the self-service laundry service. The purpose of the processing of the personal data and contact details voluntarily provided by the User who registers on one of the interfaces concerned by the processing is to enable the User concerned to use the self-service laundry services as a registered user.

Related services:

- washing and drying at registration price
- virtual balance usage and replenishment
- advance booking of washing and drying services
- electronic invoicing facility
- using a mobile app

9.5. Method of storage of the data: in a separate data table in the Data Controller's IT system.

## **10. Data processing lists**

10.1 Lists related to information technology data management: anonymous lists containing data indicating the browsing habits of Users, as listed in point 6, and a temporary list recording the IP addresses of the devices of Users currently browsing, kept exclusively in the information system of the Data Controller. (The other data are stored on the User's device and are not kept by the Data Controller in its own possession.)

10.2 Exchange list: a list containing the data of users who have sent a message using the contact details on the website, as listed in point 7, and containing the data of the persons concerned by the ongoing exchange of information, for the duration of the exchange of information only. At the end of the exchange, the data of the data subject will be removed from the list.

10.3. newsletter mailing list: maintained for the purpose of sending newsletters, messages, information material and awareness-raising offers by e-mail, with the data listed in point 8. The data will be processed by the Data Controller until the User's consent is withdrawn (unsubscribed) or until the data is deleted at the User's request.

10.4. Registration list: list containing the registration data of the registered users listed in section 9. The data will remain on this list until the registration is cancelled by the User or the Data Controller or until the User's request for cancellation is processed.

10.5. Data transfer register: the Data Controller shall keep a data transfer register for the purpose of monitoring the lawfulness of the data transfer and informing the data subject, which shall contain the date of the transfer of personal data processed by the Data Controller, the

legal basis and the recipient of the transfer, the scope of the personal data transferred and other data specified in the legislation providing for the processing.

10.6 Data Protection Incident Register: a record of unlawful processing or processing of personal data and the measures taken to rectify the same. It includes the scope of personal data affected by the personal data breach, the number and type of data subjects affected by the personal data breach, the date, circumstances and effects of the personal data breach and the measures taken to remedy it, and, in the case of processing based on a legal obligation, other data specified in the law requiring the processing.

10.7 In order to achieve the data management purposes, the Data Controller stores the data in the form of separate lists, as described above, in databases, separate for each data management purpose, in its IT system, and also by printing paper contracts/statements for the purpose of sending newsletters.

## **11. Duration of data processing**

11.1 The processing in accordance with the specific processing purposes is processed until the processing purposes are fulfilled or until the User's consent is withdrawn or until the User concerned requests deletion.

11.2 Accordingly, data processing shall continue until the consent is withdrawn, the request for cancellation is fulfilled, the registration is cancelled, the newsletter is unsubscribed from, and in the relevant cases until the statutory obligation is fulfilled. The User may at any time object to the processing, request the cessation of processing, the cessation of certain forms of processing or the deletion of data for specific purposes and in their entirety. In such cases, the processing shall continue until the receipt and processing of such a request, which shall be carried out by the Controller without undue delay, but not later than 10 working days. The User may unsubscribe from the newsletter at any time by using the unsubscribe link included in the newsletters, by sending a written request to **info@bubbles.hu** or by sending the objections or requests outlined above by e-mail. Any request sent by e-mail to will be considered as valid by the Data Controller only if it is sent from the e-mail address provided by the User to the Data Controller at the time of registration or in connection with the use of the website or when subscribing to the newsletter and registered with the Data Controller, however, the use of another e-mail address will not constitute a disregard of the request.

## **12. How data is stored**

12.1 The Data Controller shall store the data in its IT system in the form of separate lists, in databases separated according to the purposes of data processing.

12.2 The Data Controller stores its databases using the Amazon Cloud service. The Amazon Cloud service is provided by Amazon Web Services Inc (410 Terry Avenue North Seattle, WA

98109, USA), which does not have access to the data, but only records and stores it. The adequacy of the data transfer is ensured by the general data protection clauses pursuant to Article 46(2)(c) GDPR.

### **13. Deletion, blocking of data**

13.1 Data processing shall cease in all respects and the data shall be deleted within 10 working days of receipt of the User's request to this effect, including the deletion of data already transferred to a new controller (provided that deletion is not excluded by law).

13.2 Instead of deletion, the Data Controller shall block the personal data if the User so requests or if, on the basis of the information available to it, it can be assumed that deletion would harm the legitimate interests of the User. The blocked personal data may be processed only for as long as the processing purpose which precluded the deletion of the personal data persists.

13.3 Furthermore, the Controller shall delete the personal data if.

- treatment is unlawful,
- the processed data is incomplete or inaccurate - and this situation cannot be lawfully remedied - provided that erasure is not excluded by law,
- the purpose of the processing has ceased or the statutory time limit for storing the data has expired,
- ordered by a court or the National Authority for Data Protection and Freedom of Information.

### **14. Transmission of data**

14.1. The data subjects concerned by the transfer of data are: users who top up their balances on the [www.my.bubbles.hu](http://www.my.bubbles.hu) website, users who top up their balances, book a washing machine and/or dryer, pay for a washing machine and/or dryer via the Bubbles Laundry IOS or Android mobile application, and users who choose to pay by credit card via the Bubbles payment machine, regardless of the use of other services provided by the aforementioned interfaces.

14.2. Recipient of the transfer:

#### **OTP Bank Plc**

Abbreviated name: OTP Bank Nyrt.

Company registration number: 01-10-041585

Tax number: 10537914-4-44  
Head office: 1051 Budapest, Nádor u.16.  
Postal address: 1132 Budapest, Váci út 4. 1.  
Website: <https://www.otpbank.hu>

#### 14.3. Recipient of the transfer:

##### **OTP Mobil Szolgáltató Kft.**

Company registration number: 01-09-174466  
Tax number: 24386106-2-42  
Head office: 1143 Budapest, Hungária krt. 17-19.  
Postal address: 1143 Budapest, Hungária krt. 17-19.  
E-mail address: [ugyfelszolgalat@simple.hu](mailto:ugyfelszolgalat@simple.hu)  
Telephone numbers: 06 1 3666 611; 06 70 3666 611; 06 30 3666 611; 06 20 3666 611  
Website: [www.otpmobil.hu/](http://www.otpmobil.hu/)

Online credit card payments and top-ups are made through Simple Pay. Credit card details are not passed to the merchant. The service provider OTP Mobil Kft. is an institution supervised by the National Bank of Hungary.

By accepting this privacy statement, the user also makes the following transfer declaration:

- I acknowledge that the following personal data stored by the data controller Bubbles International Zrt. (9027 Győr, Kandó Kálmán u. 11-13.) in the user database of [www.bubbles.hu](http://www.bubbles.hu) will be transferred to OTP Mobil Kft. as the data processor. The scope of the data transmitted by the data controller is as follows:
  - username
  - Surname
  - first name
  - Country
  - phone number
  - e-mail address.

The nature and purpose of the data processing activities carried out by the processor can be found in the SimplePay Privacy Notice at the following link: <http://simplepay.hu/vasarlo-aff>

14.4. Legal basis for the transfer of data: article 6 (1) (a) GDPR and the Infotv. Article 6(6)(1)(a) of the GDPR and Article 5(1)(a) of the GDPR, the consent of the User. The User voluntarily consents to the processing of his/her data necessary for the secure processing of online payments by selecting the online balance top-up or credit card payment method after having read the data processing information.

14.5. Scope of the data transmitted:

- username
- Surname
- first name
- Country
- phone number
- e-mail address.

14.6. Purpose of the data transfer: to ensure the proper operation of the payment service and the technical processing of payments, to confirm transactions, to operate fraud-monitoring - a fraud detection system supporting the control of banking transactions initiated electronically - in order to protect the interests of users, and to provide customer service assistance to the User.

14.7. The transfer of data will be made solely for the purposes set out above.

14.8 Furthermore, the Data Controller shall only transmit data to public authorities if required to do so by law.

14.9. The Data Controller does not transmit data to third parties for commercial or marketing purposes e.

14.10. The Data Controller shall keep a record of data transfers as defined in the Infotv.

## **15. Use of a data processor**

The Data Controller uses the following entities as data processors.

### **15.1. IT data processing**

15.1.1.1 The data subjects concerned by the processing are Users who visit the Website, regardless of their use of the services provided by the Website.

15.1.2. The Data Controller uses as a data processor

### **Morning Star Investment Korlátolt Felelősségű Társaság**

Abbreviated name: Morning Star Investment Kft.

Company registration number: 01 -09-322235

Tax number: 14891197-1-42

Head office: 1065 Budapest, Bajcsy Zsilinszky út 5.

Phone: +36 30 720 9324

E-mail: [morningstarsinvest@gmail.com](mailto:morningstarsinvest@gmail.com)

as a **web hosting provider**, website developer and maintainer (hereinafter referred to as the "Data Processor").

15.1.3. The Data Controller uses as a data processor

**GLOSTER - MINERO IT HUNGARY Service and Consulting Limited Liability Company**

Company registration number: 01-09-952137

Tax number: 23083415-2-43

Headquarters: 1095 Budapest, Tinódi utca 1-3. ground floor door 6.

Phone: +36 70 661 4974

E-mail: [office@minero.hu](mailto:office@minero.hu)

as the **developer** and maintainer of the **payment machine and the Bubbles mobile application** (hereinafter referred to as the "Data Processor").

15.2. Processing of data related to the sending of newsletters

15.2.1. Data subjects concerned by the processing: users who subscribe to the newsletter on the Website, regardless of their use of other services provided by the Website.

15.2.2.2. The Data Controller uses as a data processor

**MAILCHIMP**

Abbreviated name: MAILCHIMP

Tax number: EU 826477914

Headquarters: USA, 30308 Atlanta 675 Ponce de Leon Suite 5000

E-mail: [info@mailchimp.com](mailto:info@mailchimp.com)

Website: <https://www.mailchimp.com>

as the **developer** and maintainer of the **newsletter sending software** used by the Data Controller (hereinafter referred to as the "Data Processor").

15.3. Processing of data relating to the Controller's statements

15.3.1.

**Sándor Pethő sole proprietor**

Abbreviated name: Pethő Sándor ev.

Tax number: 66853118-1-36  
Head office: 5000 Szolnok, Balassa út 13/a.  
Postal address: 5000 Szolnok, Balassa út 13/a.  
E-mail: pethosan@gmail.com

a sole trader as the developer and maintainer of the Data Controller's performance report software (hereinafter referred to as the "Data Processor").

15.4. Data management in relation to the Controller's accounting.

15.4.1.

**VGD Hungary Limited Liability Company**

Abbreviated name: VGD Hungary Kft.  
Company registration number: 01-09-693995  
Tax number: 12591815-4-41  
Address: 12591815-4-41  
Postal address: 1134 Budapest, Váci út 33.  
Phone: +36 1 225 7575

a company as the accountant of the Data Controller (hereinafter referred to as the "Data Processor").

15.4.2. The Data Controller uses as a data processor

**MOBILCONSULT Auditing and Economic Consulting Limited Liability Company**

Abbreviated name: Mobilconsult Könyvvizsgáló és Gazdasági Tanácsadó Kft.  
Company registration number: 01-09-079760  
Tax number: 10616008-2-42  
Head office: 1148 Budapest, Nagy Lajos király útja 37/B. 1. floor. 6.  
Postal address: 1148 Budapest, Nagy Lajos király útja 37/B. 1. floor. 6.  
Phone: +36 1 999 0369  
E-mail: [mobilconsult@mobilconsult.hu](mailto:mobilconsult@mobilconsult.hu)

Website: <http://www.mobilconsult.hu> as the auditor of the Data Controller (hereinafter referred to as the "Data Processor").

15.4.3. The Data Controller uses as a data processor

**Kboss.hu Trading and Services Limited Liability Company**

Abbreviated name: Kboss.hu Trade and Service Ltd.  
Company registration number: 01-09-303201  
Tax number: 13421739-2-41  
Registered office: 1031 Budapest, Záhony utca 7.  
Postal address: 1031 Budapest, Záhony utca 7.  
E-mail: [kboss@kboss.hu](mailto:kboss@kboss.hu)

a company as the developer of the billing software used by the Data Controller (hereinafter referred to as the "Data Processor").

#### 15.5. Processing of data related to the operation of the Data Controller's Call Center

##### 15.5.1 The Data Controller uses as a data processor

### **MULTICOM CONTACT Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság**

Short name: Multicom Contact Kft.  
CO. reg. number: 01 09 686596  
Tax number: 11985750-2-43  
Address: 1121 Budapest, Zsigmondy Vilmos u 8/b.  
E-mail: [bubbles@multicom.hu](mailto:bubbles@multicom.hu) , [attila.rosta@multicom.hu](mailto:attila.rosta@multicom.hu)

as the operator of the call centre used by the Data Controller (hereinafter referred to as the "Data Processor").

#### 15.6. Data processing related to the management of the Google and Facebook accounts of the Data Controller

##### 15.6.1. The Data Controller will use as a data processor.

### **Profelis Trade and Services Limited Liability Company**

Abbreviated name: Profelis Kft.  
Company registration number: 01-09-866849  
Tax number: 13664316-2-43  
Headquarters: 1125 Budapest, Rózse utca 16. 4. em. door 1.  
Phone: +36-20-460-1537  
E-mail: [info@profelis.hu](mailto:info@profelis.hu)  
Website: [www.profelis.hu](http://www.profelis.hu)

as a partner used by the Data Controller to manage the Google and Facebook accounts of the Data Controller (hereinafter referred to as the "Data Processor").

15.7. The Data Controller uses as a data processor

**CONTROLL LUDOVKA Trade and Service Company Limited Liability Company**

Abbreviated name: CONTROLL LUDOVKA Kereskedelmi és Szolgáltató Kft.

Company registration number: 01-09-360387

Tax number: 10727139-2-43

Head office: 1033 Budapest, Szőlőkert utca 4/A.

Location: 1033 Budapest, Szőlőkert utca 4/A.

Postal address: 1033 Budapest, Szőlőkert utca 4/A.

E-mail: [megyeriistvan@me.com](mailto:megyeriistvan@me.com)

a company as the service provider of the Data Controller's self-service laundries (hereinafter referred to as the "Data Processor").

15.8 For the access system at the late night entry to the laundries the Data Controller will be used as a data processor:

LINK Mobility Hungary Kft.,

LINK Mobility Kft.,

company registration number: 01-09-694287.

VAT number: 12598582-2-42

address: 1062 Budapest, Andrássy út 68. fszt. C11.

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

The telephone number provided for access is used exclusively as a service for sending an access code by SMS, which is not linked to any other personal data and will be automatically deleted from the system in 30 days after the SMS is sent.

15.9 No other processing of data will take place.

15.10 Processors have no interest in the business of the Data Controller.

15.11. The Data Controller does not use any other data processor than the Data Processors indicated above.

**16. User's rights in relation to data management**

16.1. Upon the User's request, the Data Controller shall provide information about the User's data processed by the Data Controller or by the Data Processor it or it has appointed, the source of the data, the purpose, legal basis and duration of the processing, the name and address of the Data Processor and its activities related to the processing, the circumstances and effects of any data breach and the measures taken to remedy the data breach, and, in the case of the transfer of the data subject's personal data, the legal basis and the recipient of the data transfer. The Controller shall provide the information in writing within 25 days of the request. The first such request in a given year for a given set of data shall be free of charge, in other cases the cost shall be HUF 1,000 (except for unlawful processing or if the request leads to rectification). The User may also request rectification of his/her processed data, which the Controller shall promptly provide within 25 days. The User shall have the right to rectify his/her personal data  
may be limited by law.

16.2 Each User has the right to refuse or prohibit the inclusion of his/her name and address data, contact details on a marketing list, the use of his/her data for direct marketing purposes or for specific purposes within a specific list, the use of such data for sending newsletters or the transfer to third parties, as well as to request the blocking of his/her personal data, the termination of the processing of all or specific lists held by the Data Controller, including data transferred to third parties. The Data Controller shall carry out the erasure within 10 working days of receipt of the request and shall inform the User concerned in writing within a further 15 days of the execution of the request.

16.3. The User may send comments and requests by post to the address of the Data Controller indicated in point 1.1, or by e-mail to the e-mail address **info@bubbles.hu**. Requests sent by e-mail shall be considered as authentic by the Data Controller only if they are sent from the e-mail address provided by the User to the Data Controller at the time of registration and registered there. In the case of e-mail, the date of receipt shall be deemed to be the first working day following the sending of the request.

16.4 The Data Controller shall mark the personal data processed by it if the User disputes its correctness or accuracy, but the incorrectness or inaccuracy of the disputed personal data cannot be clearly established. The Controller shall notify the User concerned and all those to whom the data were previously transmitted for processing purposes of the rectification, blocking, marking and erasure. The notification may be omitted if this does not prejudice the legitimate interests of the User concerned with regard to the purpose of the processing.

16.5 The Data Controller shall delete personal data if the processing is unlawful, the User concerned requests it, the purpose of the processing has ceased, or the statutory period for storing the data has expired, or the court or the data protection authority has ordered it.

16.6 If the Data Controller does not comply with a request for rectification, blocking or erasure by the User concerned, the Data Controller shall, within 25 days of receipt of the request,

inform the User in writing of the factual and legal grounds for refusing the request for rectification, blocking or erasure. In the event of refusal of a request for rectification, erasure or blocking, the Data Controller shall inform the User concerned of the following:

The User may contact the Authority (National Authority for Data Protection and Freedom of Information, 1055 Budapest, Falk Miksa utca 9-11., Postal address: 1363 Budapest, PO Box 9, Phone: +36 1 391 1400, Fax: +36 1 391 1410, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) regarding the decision of the Data Controller, and the User concerned may also contact the court within 30 days of the notification of the decision or the last day of the above deadline in case of violation of his/her rights or if the Data Controller does not comply with his/her objection to the processing of personal data. The court of law shall have jurisdiction to rule on the action. The lawsuit may also be brought before the courts of the place of residence or domicile of the User concerned, at the choice of the User concerned.

## **17. Data protection, data security**

17.1 The Data Controller shall ensure the security of data in its data processing and data handling activities, and shall ensure the enforcement of legal provisions and other data protection and confidentiality rules by technical and organisational measures and internal procedural rules. In particular, it shall take appropriate measures to protect the processed data against unauthorised access, alteration, disclosure, deletion or destruction, accidental destruction or accidental damage and against inaccessibility resulting from changes in the technology used.

17.2 To this end, the Data Controller uses the http protocol "https" to access the website, which allows web communication to be encrypted and uniquely identified. In addition, as described above, the Data Controller stores the processed data in encrypted data files, which are stored in separate processing lists for each processing purpose, accessible to specific employees of the Data Controller who are responsible for the protection and responsible processing of the data in accordance with this Policy and the applicable laws.

17.3 The data on which the measurement of the number of visits and the mapping of the habits of using the website are based are recorded by the Data Controller's IT system anonymously from the beginning and cannot be linked to any person.

17.4 The processing of data will only be carried out for the legitimate purposes set out in this notice, to the extent necessary and proportionate for those purposes, in accordance with the applicable laws and recommendations, and with appropriate security measures.

## **18. Enforcement**

18.1. Data subjects may exercise their rights before the courts under Act V of 2013 on the Civil Code and Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of

Information, and may also apply to the National Authority for Data Protection and Freedom of Information:

**National Authority for Data Protection and Freedom of**

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

Postal address: 1363 Budapest, Pf.: 9.

Phone: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <http://www.naih.hu/>

In the event of a court proceeding, the action may be brought before the court of the User's domicile or residence, at the choice of the User concerned, as the court has jurisdiction to hear the case.

Dated: Győr, 2023.06.30.

BUBBLES International Zrt.