

1. Purpose and Scope of the Notice

(1) The purpose of this Privacy Notice (hereinafter: the “Notice”) is to define the data processing activities carried out by **Universum 8 Zrt.** (registered office: 1052 Budapest, Károly körút 6.; company registration number: 01-10-049401; hereinafter: the “Data Controller”), to ensure the enforcement of constitutional principles of data protection, the right to informational self-determination, and data security requirements, and to ensure that, within the framework of applicable laws, individuals may control their personal data, become aware of the circumstances of data processing, and prevent unauthorized access, alteration, or disclosure of data.

Furthermore, this Notice serves to inform data subjects about the Data Controller’s data processing practices.

(2) The scope of this Notice covers all personal and special data processing activities carried out by all organizational units of the Data Controller.

2. Applicable Legislation

- Regulation (EU) 2016/679 of the European Parliament and of the Council (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 (General Data Protection Regulation; “GDPR”)
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (“Infotv.”)
- Act V of 2013 on the Civil Code (“Ptk.”)
- Act CXXX of 2016 on Civil Procedure (“Pp.”)

3. Data Controller Details

Current details of the Data Controller:

- Name: Universum 8 Zrt.
- Registered office: 1052 Budapest, Károly körút 6.
- Company registration number: 01-10-049401
- Email: info@universum8.com

4. Data Processors

(1) In order to provide comprehensive services related to the activity, we cooperate with certain external partners who may access personal data during their work. These data processors and joint controllers process personal data only to the extent necessary and for the required duration, in compliance with EU and Hungarian data protection laws.

We cooperate with the following data processors and joint controllers:

Company Name	Registered Office	Activity	Role
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Rackforest Kft.	1132 Budapest, Victor Hugo u. 18–22.	Hosting service	Data processor
MailerLite Limited	88 Harcourt Street, Dublin 2, D02 DK18, Ireland	Newsletter & marketing automation	Data processor
GLS General Logistics Systems Hungary	2351 Alsónémedi, GLS Európa u. 2.	Parcel delivery	Data controller
Google Ireland Ltd.	Gordon House, Barrow Street, Dublin	Hosting & advertising services	Data processor

(2) Apart from joint controllers and data processors, personal data will only be disclosed to other entities if required by law, public authorities, or judicial enforcement, including for the prevention of criminal acts (e.g., fraud) and protection of the Data Controller's rights.

5. Scope of Processed Personal Data, Purpose, Duration, and Legal Basis

(1) Data processing is based on voluntary consent or legal authorization. Data subjects may request information about their data and withdraw consent at any time.

(2) Data providers must provide accurate data to the best of their knowledge.

(3) If personal data of another person is provided, consent must be obtained.

(4) The Data Controller keeps records of data transfers.

(5) Data processing is primarily related to organizing prize games or competitions.

Purpose: conducting prize games, notifying winners, communication.

Legal basis: voluntary consent.

(7) Categories of processed data:

- Full name – for communication and identification
- Email address – for contact
- Date of birth or age – for eligibility verification
- Gender – for relevant content
- Username / game data – for performance tracking
- Phone number – for immediate notification
- Address – for prize delivery and content

(8) Data retention period: **5 years**.

(9) Winners may consent to having their name published.

6. Rights of Data Subjects

Data subjects have the right to:

- Request information about data processing
- Request correction or deletion
- Withdraw consent
- Access their data (including purposes, categories, recipients, storage duration, etc.)
- Request data portability
- Object to automated decision-making

Data copies are provided free of charge (additional copies may incur fees).

Response deadline: **25 days**.

Deletion must occur within **5 working days** if applicable conditions are met.

7. Contact

- Universum 8 Zrt., 1052 Budapest, Károly körút 6.
- Phone: +36 20 966 9881
- Email: info@universum8.com
- DPO: dpo@universum8.com

Emails are stored for **5 years**.

8. Data Storage and Security

Data is stored both physically and electronically.

The Data Controller ensures:

- Integrity
- Authenticity
- Availability
- Confidentiality

Protection includes safeguards against:

- Unauthorized access
- Modification
- Deletion
- Disclosure
- Damage or loss

In case of a data breach, affected parties are notified within **72 hours**.

9. Procedural Rules

- Requests are answered within **25 days**

- May be extended by **60 days** if necessary
 - Free of charge unless excessive or repetitive
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10. Compensation

Data subjects are entitled to compensation for damages caused by unlawful data processing. Liability is shared between the Data Controller and processors where applicable.

11. Legal Remedies

- Contact the Data Controller first
- Legal action may be initiated before a competent court
- Complaints can be filed with:

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

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Email: ugyfelszolgalat@naih.hu

Website: www.naih.hu

12. Cooperation with Authorities

The Data Controller provides data to authorities only when legally required and only to the necessary extent.

Dated: Budapest, 2026