

**PRIVACY NOTICE**  
**ON THE RIGHTS OF NATURAL PERSONS**  
**REGARDING THE PROCESSING OF THEIR PERSONAL DATA**

**1. Purpose of the Privacy Notice**

**1.1.** [Stark Hunting Kft.](#) (hereinafter referred to as the “Service Provider” or “Data Controller”), as Data Controller, acknowledges the contents of this legal notice as binding upon itself. It undertakes to ensure that all data processing activities related to its operations comply with the requirements set out in this policy, the applicable national legislation, and the legal acts of the European Union.

**1.2.** The data protection guidelines related to the data processing activities of [Stark Hunting Kft.](#) are continuously available on the website and at the address of its registered office.

**1.3.** [Stark Hunting Kft.](#) reserves the right to amend this notice at any time. Naturally, visitors will be informed of any changes in due time.

**1.4.** Should you have any questions regarding this notice, please contact us in writing and our colleague will answer your inquiry.

**1.5.** [Stark Hunting Kft.](#) is committed to protecting the personal data of its clients and partners and considers it particularly important to respect its clients’ right to informational self-determination. [Stark Hunting Kft.](#) treats personal data confidentially and takes all security, technical, and organizational measures necessary to guarantee the security of the data.

**1.6.** Below, [Stark Hunting Kft.](#) describes its data processing practices.

**1.6.1. Details of the Data Controller**

Company name:	Stark Hunting Kft.
Registered office:	1021 Budapest, Ötvös János utca 11/B., Hungary
Tax number:	25871492-2-41
Company registration number:	01-09-293662
E-mail:	info@starkhunting.hu
Website:	www.huntingandhungary.com

**1.6.2. External Data Processors Used by Stark Hunting Kft.**

Company name: Vital-Comp Kft.  
Registered office: 1037 Budapest, Laborc köz 9., Hungary

Company name: Silver Star Consulting Kft.  
Registered office: 1046 Budapest, Berzsényi Dániel tér 12/B., Hungary

---

**2. Scope of Personal Data**

**2.1.** The data processing activities of [Stark Hunting Kft.](#) are based on voluntary consent, legal obligation, and performance of the contract. In the case of data processing based on voluntary consent, data subjects may withdraw their consent at any stage of the processing.

**2.2.** The principles of data processing are in compliance with the applicable data protection legislation, in particular:

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (“Infotv.”)
  - Regulation (EU) 2016/679 of the European Parliament and of the Council 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 – GDPR)
  - Act V of 2013 on the Civil Code
- 

### 3. Definitions

**Data File:** The totality of data managed within a single registry.

**Data Processing:** The performance of technical tasks related to data management operations.

**Data Processor:** A natural or legal person who processes personal data on the basis of a contract.

**Data Controller:** A natural or legal person who determines the purposes of data processing, makes and implements decisions regarding data processing, or has such decisions implemented by a data processor engaged by them.

**Data Processing (Management):** Any operation performed on data, such as collection, recording, registration, organization, storage, use, transfer, blocking, deletion, destruction, and prevention of further use of the data. Data processing also includes the creation of photographs, audio recordings, or video recordings.

**Data Destruction:** The physical destruction of data or the data carrier containing the data.

**Data Transfer:** Making data accessible to a specified third party.

**Data Deletion:** Rendering data unrecognizable in such a way that its restoration is no longer possible.

**Data Blocking:** Rendering the transfer, access, deletion, or use of data impossible permanently or for a specified period.

**Data Protection Incident:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data transmitted, stored, or otherwise processed.

**Data Subject:** A natural person identified or identifiable directly or indirectly on the basis of personal data.

**User:** A natural person visiting the website of [Stark Hunting Kft.](#)

**Consent:** A voluntary and explicit indication of the data subject’s wishes, based on adequate information, by which they give their unambiguous agreement to the processing of personal data relating to them.

**Personal Data:** Any data relating to the data subject, in particular the data subject’s name and identification mark. Personal data retains this quality during processing as long as its connection with the data subject can be restored.

**Objection:** A statement by the data subject objecting to the processing of their personal data and requesting the termination of the processing and/or deletion of the processed data.

## 4. Data Processing

### 4.1. Principles

4.1.1. Personal data may be processed if

- a) the data subject gives consent thereto, or
- b) it is ordered by law for reasons of public interest.

4.1.2. Personal data may only be processed for a specified purpose, in order to exercise a right or fulfill an obligation. The processing of data must comply with this purpose at every stage.

4.1.3. Only personal data that is essential for achieving the purpose of the processing and suitable for achieving that purpose may be processed, and only to the extent and for the duration necessary to achieve the purpose.

4.1.4. Personal data may only be processed on the basis of properly informed consent.

4.1.5. The data subject must be clearly and comprehensibly informed about the purpose, legal basis, duration of the data processing, the identity of the Data Controller and Data Processor, as well as their rights and available legal remedies.

---

### 4.2. Security of Personal Data

4.2.1. The IT systems and other data storage locations of [Stark Hunting Kft.](#) are located at its registered office, at external backup locations, and at its data processors.

4.2.2. During the provision of its services, [Stark Hunting Kft.](#) selects and operates IT tools used for processing personal data in such a way that the processed data:

- a) is protected against unauthorized access (confidentiality),
- b) its integrity can be verified (integrity),
- c) is accessible to authorized persons (availability),
- d) and its authenticity and verification are ensured (authenticity of data processing).

4.2.3. [Stark Hunting Kft.](#) protects data with appropriate measures, particularly against unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction or damage.

4.2.4. Electronic messages transmitted over the internet, regardless of protocol (e-mail, web, FTP), are vulnerable to network threats that may lead to unfair activity, disputes regarding contracts, or disclosure or modification of information. In order to protect against such threats, the Data Controller and Data Processor take all reasonable precautions; however, hacker attacks may still occur despite these measures.

---

### 4.3. Cookies

4.3.1. Cookies are small data files placed on the visitor's computer through the website and stored by the visitor's internet browser.

Most commonly used internet browsers accept and allow cookies by default. Visitors may reject or disable them by modifying their browser settings. More information about the use of cookies can be found in the Help section of each browser.

**4.3.2.** [Stark Hunting Kft.](#) uses cookies on its website for the purpose of storing sessions and enabling the linking of the user's current visit with previous visits, exclusively with regard to its own content. When visiting and browsing the website [www.huntingandhungary.com](http://www.huntingandhungary.com), anonymous data without personal identifiers are collected regarding the visit, on the basis of which visit statistics are analyzed.

**4.3.3.** Acceptance of cookies is not mandatory. However, [Stark Hunting Kft.](#) accepts no responsibility if the website does not function as expected due to cookies being disabled.

**4.3.4.** Users may disable cookies in their browser settings. Cookie management options are generally available in browsers under the Tools/Settings menu, within Privacy settings, under the designation "cookie" or "cookies."

---

#### **4.4. Purpose and Legal Basis of Data Processing**

**4.4.1.** The data processing activities of [Stark Hunting Kft.](#) are based on voluntary consent.

**4.4.2.** In certain cases, however, the processing, storage, and transfer of certain provided data are required by law.

**4.4.3.** If the person providing the data submits personal data other than their own, it is the responsibility of the data provider to obtain the consent of the data subject.

**4.4.4.** The purposes of data processing are:

- a) establishing contact,
- b) ensuring the provision of services, including obtaining the necessary official permits,
- c) handling orders and contracts,
- d) fulfilling contractual obligations and exercising rights arising from orders and service provision,
- e) fulfilling accounting obligations and issuing invoices,
- f) sending offers.

**4.4.5.** The legal basis for data processing is the voluntary consent of the data subject.

**4.4.6.** In certain cases, however, the processing, storage, and transfer of certain provided data are required by law.

**4.4.7.** In all cases where the Company intends to use voluntarily provided personal data for a purpose different from the original purpose of collection, the user shall be informed thereof, and the Company shall request and obtain their prior explicit consent or provide the opportunity to prohibit such use.

**4.4.8.** Scope of processed data:

- a) name, birth name,
- b) place and date of birth,
- c) address,
- d) telephone number,
- e) e-mail address,
- f) ID card number / passport number,
- g) sole trader registration number,
- h) hunting license number,
- i) firearm permit number,

- j) date and details of the order/service agreement,
- k) accounting documents related to the order and provision of services.

#### **4.4.9. Deadlines for data deletion:**

- a) 8 years from the completion date of the service agreement,
- b) retention of accounting documents for 8 years pursuant to applicable legislation,
- c) incoming correspondence, including the sender's name, e-mail address, and other voluntarily provided personal data, shall be deleted no later than three years after the matter has been resolved,
- d) basic partner data — such as name, e-mail address, and telephone number — shall be deleted no later than three years after the final termination of the business relationship.

---

### **4.5. Use of Services**

**4.5.1.** Purpose of data processing: provision of services, fulfillment of orders and contracts, and obtaining personalized official permits and insurance related to the provision of services.

**4.5.2.** Legal basis for data processing: voluntary provision of data necessary for the use of the service and fulfillment of the contract.

**4.5.3.** Scope of processed data: name, place and date of birth, address, e-mail address, telephone number, ID card/passport number, hunting license number, firearm permit number.

**4.5.4.** Duration of data processing: until the withdrawal of the data subject's declaration of consent.

---

### **4.6. Customer Correspondence**

**4.6.1.** The user/customer may contact the Data Controller in writing using the contact details provided in this notice, displayed on the website, or addressed to the Company's registered office.

**4.6.2.** The Company shall delete all incoming e-mails, together with the sender's name, e-mail address, date information, and all other personal data voluntarily provided in the message, no later than three years after the data provision.

---

### **4.7. Data Transfer**

#### **4.7.1. Payment by Bank Card**

- a) Purpose of data processing: execution and settlement of payment by bank card.
- b) Legal basis for data processing: performance of the contract.
- c) Scope of processed data: data transmitted by the bank card terminal to the Data Processor handling the transaction — transaction ID, purchase amount, and transaction date.

#### **4.7.2. Package/Shipment Delivery**

- a) Purpose of data processing: delivery of the package/shipment to the data subject.
- b) Legal basis for data processing: performance of the ordered service and contract.
- c) Scope of processed data: name, address, e-mail address, telephone number, contents and value of the shipment. Personal data transferred in this way are processed by the delivery company in accordance with its own privacy and data processing policies.
- d) In the case of paper-based recording, documents containing dispatch data shall be destroyed after

3 months. Exceptions are dispatch receipts serving as legal proof of shipment dispatch, which shall be retained for 3 years.

#### **4.7.3. Data Transfer to Authorized Hunting Operators for Service Fulfillment**

- a) Purpose of data processing: establishment of hunting services in compliance with legal requirements.
- b) Legal basis for data processing: performance of the ordered service and contract.
- c) Scope of processed data: name, birth name, place and date of birth, address, ID card/passport number, hunting license number, firearm permit number.

---

#### **4.8. Automated Decision-Making and Profiling**

**4.8.1.** The Data Controller does not carry out automated decision-making activities, including profiling.

---

#### **4.9. Other Data Processing Activities**

**4.9.1.** The Company shall provide information about data processing activities not listed in this Privacy Notice at the time the data are collected.

**4.9.2.** Authorities and other bodies authorized by law may contact the Data Controller for the purpose of requesting information, disclosure or transfer of data, or provision of documents. If the authority specifies the exact purpose and scope of the requested data, the Data Controller shall disclose only such personal data and only to the extent strictly necessary to achieve the purpose of the request.

---

#### **4.10. Handling Quality Complaints**

**4.10.1.** Purpose of data processing: handling quality complaints related to services provided by the Company.

**4.10.2.** Legal basis for data processing: data processing is necessary for the performance of the contract.

**4.10.3.** Types of processed personal data: customer's name and address, time and method of complaint submission, submitted documents, and description of the complaint.

**4.10.4.** Duration of data processing: pursuant to the Consumer Protection Act, records of complaints and copies of responses to written complaints shall be retained for five years; duplicate copies of entries in the Customers' Book shall be retained for two years.

---

#### **4.11. Extraordinary Events**

**4.11.1.** Purpose of data processing: handling extraordinary events occurring at the Company's registered office/site/event venue and preparing reports thereof.

**4.11.2.** Legal basis for data processing: the Data Controller and the affected persons have a legitimate interest in handling extraordinary events.

**4.11.3.** Scope of processed data: injured person's name, address, date of birth, telephone number, date of the accident, description of the accident and injury, description of measures taken, name of the person providing first aid (if any), witness name, address, telephone number and contact details, as well as the location of the accident.

**4.11.4.** Duration of data processing: five years with regard to accident reports.

---

## **4.12. Electronic Surveillance System**

**4.12.1.** [Stark Hunting Kft.](#) may operate an electronic surveillance and recording system at its registered office, premises, or rented properties.

**4.12.2.** Data Controller of personal data: Stark Hunting Kft.

**4.12.3.** Purpose of data processing: the installed cameras and monitored areas serve the protection of human life, physical integrity, and property by preventing and detecting unlawful acts, apprehending perpetrators, proving violations, identifying unauthorized entrants to the premises of [Stark Hunting Kft.](#), or documenting unauthorized activities.

**4.12.4.** Legal basis for data processing:

- in the case of guests/visitors: the data subject's consent by entering the premises of [Stark Hunting Kft.](#),
- in the case of employees: the relevant provisions of the Hungarian Labour Code,
- and the legitimate interest of [Stark Hunting Kft.](#) in property protection.

**4.12.5.** Type of processed personal data: facial images and any other personal data recorded by the surveillance system concerning persons entering the premises of [Stark Hunting Kft.](#).

**4.12.6.** Duration of data processing: 3 days, or 30 days in the event of extraordinary circumstances, which may be extended by an additional 30 days.

**4.12.7.** Persons authorized to view live camera images and recordings: authorized employees of [Stark Hunting Kft.](#).

**4.12.8.** Stored recordings may only be accessed by authorized persons for the purpose of proving violations affecting human life, physical integrity, or property, and identifying perpetrators. The Data Controller records all access to stored recordings, including the name of the person accessing the data, the reason for access, and the time of access, in written minutes.

## **5. Rights and Remedies**

The data subject may request information regarding the processing of their personal data and may request the rectification, deletion, or withdrawal of their personal data, as well as exercise their right to data portability and objection using the contact details of the Data Controller provided above.

---

### **5.1. Right to Information**

**5.1.1.** [Stark Hunting Kft.](#) shall take appropriate measures to provide data subjects with all information and notifications relating to the processing of personal data in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

---

## **5.2. Right of Access by the Data Subject**

**5.2.1.** The data subject shall have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the data processing,
- b) the categories of personal data concerned,
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed,
- d) the planned duration of storage of the personal data,
- e) the right to rectification, erasure or restriction of processing, and the right to object,
- f) the right to lodge a complaint with a supervisory authority,
- g) information regarding the source of the data,
- h) whether automated decision-making or profiling takes place.

**5.2.2.** [Stark Hunting Kft.](#) shall provide the requested information within a maximum of 30 days from the submission of the request.

---

## **5.3. Right to Rectification**

**5.3.1.** The data subject may request the correction of inaccurate personal data concerning them processed by [Stark Hunting Kft.](#) and the completion of incomplete data.

---

## **5.4. Right to Erasure**

**5.4.1.** The data subject shall have the right to obtain from [Stark Hunting Kft.](#) the erasure of personal data concerning them without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
  - b) the data subject withdraws consent on which the processing is based and there is no other legal ground for processing,
  - c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing,
  - d) the personal data have been unlawfully processed.
- 

## **5.5. Right to Restriction of Processing**

**5.5.1.** At the request of the data subject, [Stark Hunting Kft.](#) shall restrict processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject,
- b) the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead,
- c) the Data Controller no longer needs the personal data for the purposes of processing, but they are

required by the data subject for the establishment, exercise or defense of legal claims,  
d) the data subject has objected to processing; in such a case, the restriction applies for the period until it is determined whether the legitimate grounds of the Data Controller override those of the data subject.

**5.5.2.** Where processing has been restricted, personal data may, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, or for important public interest reasons.

---

## **5.6. Right to Data Portability**

**5.6.1.** The data subject shall have the right to receive the personal data concerning them, which they have provided to the Data Controller, in a machine-readable format, and have the right to transmit those data to another Data Controller.

---

## **5.7. Right to Object**

**5.7.1.** The data subject shall have the right to object, on grounds relating to their particular situation, to the processing of their personal data, including profiling. In the event of an objection, the Data Controller may no longer process the personal data, except where processing is required by other legal obligations.

---

## **5.8. Right to Withdraw Consent**

**5.8.1.** The data subject shall have the right to withdraw their consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

---

## **6. Procedural Rules**

### **6.1. Deletion of Personal Data**

**6.1.1.** Personal data shall be deleted within 14 working days from the receipt of the relevant request. Following the completion of a request for deletion or modification of personal data, the previous (deleted) data can no longer be restored. Exceptions apply to documents and the data contained therein where retention for a prescribed period is required by law.

**6.1.2.** The Data Controller shall inform the data subject without undue delay, but no later than within 30 days of receipt of the request, of the measures taken in response to the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by an additional 60 days.

**6.1.3.** If the Data Controller does not take action in response to the request of the data subject, it shall inform the data subject without delay, and at the latest within 30 days of receipt of the request, of the reasons for not taking action, and of the possibility of lodging a complaint with a supervisory authority and seeking judicial remedy.

**6.1.4.** [Stark Hunting Kft.](#) provides the requested information and notifications free of charge. Where the request of the data subject is manifestly unfounded or excessive, in particular because of its repetitive character, the Data Controller may charge a reasonable fee taking into account the administrative costs of providing the information or taking the requested action, or may refuse to act on the request.

---

## **6.2. Data Protection Incidents**

**6.2.1.** [Stark Hunting Kft.](#), as Data Controller, shall keep records of any data protection incidents, including the facts relating to the incident and the measures taken.

The Data Controller shall notify the Hungarian National Authority for Data Protection and Freedom of Information of any personal data breach without undue delay and, where feasible, no later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

---

## **7. Complaints to the Data Protection Authority**

### **7.1. Right to Apply to the Courts**

**7.1.1.** In the event of a violation of their rights, the data subject may bring legal proceedings against the Data Controller. The court shall proceed with the case as a matter of priority.

---

### **7.2. Data Protection Authority Procedure**

**7.2.2.** Complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information.

Name:	National Authority for Data Protection and Freedom of Information
Registered office:	1055 Budapest, Falk Miksa utca 9-11., Hungary
Telephone:	+36 1 391 1400
E-mail:	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
Web:	<a href="http://www.naih.hu">www.naih.hu</a>