

# PRIVACY POLICY (GDPR) – United Vibes Travel

**Effective date:** [14.01.2026]

## 1. Introduction

Company name: United Vibes Of Travel Kft.

Company registration number: 01 09 434203;

VAT number: 32626926242;

Registered seat: 1064 Budapest, Vörösmarty utca 59. 1. emelet 12. Ajtó

Electronic contact details: [info@unitedvibes.travel](mailto:info@unitedvibes.travel)

(hereinafter: “**Service Provider**” and/or “**Controller**”) issues this Data Management and Privacy Policy (hereinafter: “**Policy**”) in relation to the operation of the website <https://unitedvibes.travel> (hereinafter: “**Website**”) and the processing of personal data for newsletter and direct marketing communications.

1.2. The **Data Subject** is any natural person who (i) subscribes to the newsletter via the Website, and/or (ii) is a professional contact of the Controller (obtained through direct meetings, events, or direct email communications).

1.3. The purpose of this Policy is to define the scope of data processed by the Controller, the methods, purposes, legal bases and duration of processing, and to ensure GDPR-compliant data protection and data security measures.

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## 2. Applicable Legal Regulations

2.1. This Policy is based primarily on:

- Regulation (EU) 2016/679 (**GDPR**)
- **Act CXII of 2011** on the Right of Informational Self-Determination and on Freedom of Information (Hungary) (**Info Act**) (*if the Controller is established in Hungary*)
- **Act XLVIII of 2008** on Commercial Advertising Activities (Hungary) (*if applicable*)
- Any other relevant EU / Member State laws applicable to the Controller’s establishment and operations.

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## 3. Definitions

For the purposes of this Policy:

- **Data Subject:** an identified or identifiable natural person.
- **Personal data:** any information relating to an identified or identifiable natural person (e.g., email address, name).
- **Controller:** the entity which determines the purposes and means of processing.
- **Processing:** any operation performed on personal data (collection, storage, use, deletion, etc.).
- **Consent:** freely given, specific, informed and unambiguous indication of the Data Subject's wishes (GDPR Art. 4(11)).
- **Newsletter / Direct marketing:** marketing messages sent electronically (email) about services, updates, events or news.
- **Cookie:** a small text file stored on a device. *(Only relevant if cookies beyond strictly necessary are used.)*

Where this Policy differs from definitions under GDPR, the GDPR definitions prevail.

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## 4. Voluntary Consent and General Principles

4.1. The Controller processes personal data in relation to the newsletter primarily based on the Data Subject's **voluntary, informed and explicit consent** (GDPR Art. 6(1)(a)).

4.2. For professional contacts obtained through direct meetings or direct communications, the Controller may process personal data based on **legitimate interests** (GDPR Art. 6(1)(f)) for maintaining B2B relationships and sharing relevant updates, provided the Data Subject is offered a clear and easy opt-out.

4.3. The Data Subject may withdraw consent or object to processing at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

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## 5. Purposes of Processing and Scope of Data Processed

5.1. The Controller processes personal data only for defined purposes and in line with the data minimisation principle.

### 5.2. Newsletter subscription (Website form)

**Purpose:** sending newsletters and marketing communications.

**Legal basis:** GDPR Art. 6(1)(a) (consent).

**Data categories:**

- Email address (mandatory)
- Name (optional)
- Company/role (optional)

**Retention:** until unsubscribe / withdrawal of consent, then deletion within a reasonable period, unless legal claims require retention.

### **5.3. Direct professional contacts (meetings, events, email introductions)**

**Purpose:** maintaining business relationships; sending relevant communications about services/updates.

**Legal basis:** GDPR Art. 6(1)(f) (legitimate interest) OR Art. 6(1)(a) if explicit consent is collected.

**Data categories:**

- Name
- Email address
- Company name / role
- Business communication metadata (e.g., when and how contact was established)

**Retention:** until you object or request deletion; otherwise periodically reviewed, and deleted when no longer necessary.

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## **6. Method of Data Collection**

### 6.1. Data is collected:

- directly from the Data Subject via the newsletter subscription form on the Website; and/or
- from the Data Subject through direct business communications (email, meetings, events).

6.2. The Controller does not intentionally collect sensitive data (special categories under GDPR Art. 9). Data Subjects should not provide such data via the Website.

6.3. The Controller does not use personal data for automated decision-making or profiling that produces legal effects concerning the Data Subject.

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## 7. Data Processors, Storage Location, Data Transfers

7.1. Personal data is stored and processed **within the European Union**.

7.2. The Controller may use service providers (**data processors**) necessary for website operation and newsletter delivery (e.g. hosting provider, email marketing platform). Such processors act under a **Data Processing Agreement (DPA)** and may process personal data only on the Controller's documented instructions.

### **Data processors (fill in):**

- **Website hosting provider:** [Rackhost] – purpose: hosting and technical operation of the Website
- **Newsletter/email provider:** [Mailchimp] – purpose: subscription management and email sending

7.3. The Controller does not transfer personal data outside the EEA unless appropriate safeguards under GDPR are in place (e.g., adequacy decision or Standard Contractual Clauses).

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## 8. Data Security

8.1. The Controller implements appropriate technical and organisational measures to protect personal data, including:

- access control and limitation to authorised persons,
- secure authentication and administrative access,
- encryption/security measures provided by hosting and newsletter tools,
- regular updates and vulnerability management,
- minimisation of stored data.

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## 9. Duration of Processing / Retention

9.1. Newsletter data is retained until the Data Subject unsubscribes or withdraws consent.

9.2. Direct-contact data is retained until objection/deletion request, or until the Controller determines the contact is no longer relevant for the stated purposes (periodic review).

9.3. The Controller may retain limited data longer if necessary for establishing, exercising or defending legal claims (GDPR Art. 6(1)(f)).

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## 10. Data Subject Rights

The Data Subject has the right to:

- request access to personal data (GDPR Art. 15),
- request rectification (Art. 16),
- request deletion (“right to be forgotten”) (Art. 17),
- request restriction of processing (Art. 18),
- data portability (Art. 20) (*where applicable*),
- object to processing based on legitimate interest (Art. 21),
- withdraw consent at any time (Art. 7(3)),
- lodge a complaint with a supervisory authority.

**To exercise rights, contact: [info@unitevibes.travel](mailto:info@unitevibes.travel)**

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## 11. Complaint / Supervisory Authority

If the Controller is established in Hungary, the competent authority is:

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

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Mail: 1530 Budapest, Pf.: 5.

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## 12. Cookies

12.1. The Website currently uses only strictly necessary cookies and may collect any non-essential (e.g., analytics or marketing) cookies.

12.2. If analytics/marketing cookies are introduced, a cookie banner/consent mechanism will be implemented.

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## 13. Amendments

13.1. The Controller may unilaterally update this Policy. The updated version will be published on the Website with a revised “Last updated” date.

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## 14. Contact

**Controller:** United Vibes Of Travel Kft

**Registered seat:** 1064 Budapest, Vörösmarty utca 59. 1. emelet 12. Ajtó

**Email:** info@unitevibes.travel

**Website:** <https://unitedvibes.travel>