

PRIVACY NOTICE

Social Media

Processing of Data of Followers and Likers

Effective from: 5 December 2025

In compliance with Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, as well as 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 (GDPR – General Data Protection Regulation), we hereby inform you about the processing of personal data you have provided:

1. The Data Controller

Controller name		CPM Construction Project Management Kft.
Controller address		2030 Érd, Etelka utca 6.
Controller contact details	email	szamitas@szamitas.com
	telephone	+36 23 754 028
	website	https://szamitas.com/
Data Protection Officer name (if any)		--
Data Protection Officer contact details		--

2. Personal Data Processed

Scope of Data Processed, Purpose and Legal Basis for Processing			
Personal Data	Purpose of Processing	Legal Basis for Processing	Retention Period

<p>Publicly available data and comments accessible in the personal profiles of followers and users active on the page So-called event data processed by Facebook Data provided through advertising forms: name, telephone number, email address, city, customer request</p>	<p>Promotion of the data controller's services on social media platforms, management of followers, reactions, comments, provision of information, sharing of content, establishing connections, networking, brand-building</p> <p>Sending of targeted advertisements, campaigns, advertising optimisation, use of statistics, online lead generation, acquiring new customers, increasing sales, marketing outreach based on the submitted form</p>	<p>The data subject's consent – GDPR Art. 6(1)(a)</p>	<p>Until the withdrawal of consent or until the deletion of the entry by the data subject, but at the latest until the operation of the social media platform.</p> <p>Further detailed information is provided in the privacy notice of the social media platform.</p> <p>During the use of social media platforms, the data controller does not store personal data. The data controller accesses the data through page administration, or processes the data indirectly through certain services of the social media (e.g.: advertisements) – it does not have direct access to such data.</p>
---	---	---	--

Related Legislation	
--	

Is profiling carried out during processing?	
Response	Brief, understandable description of profiling
No	---

Is automated decision-making carried out during processing?	
Response	Brief, understandable description of automated process
No	---

If yes, the data subject has the right to request manual human intervention.

Source of personal data processed:
The Data Subject

The data are transferred to:	
Category	Company name, registered address, activity
Data Processors (carrying out technical	YouTube – Google LLC, San Bruno, 94043, USA, California – Social media LinkedIn, 2029 Stierlin Court Ste 200, Mountain View, California, 94043, United

tasks related to processing operations)	States – Social media TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland – Social media
Recipients	

Transfers to third countries (outside the EU):	
Data processor name, transfer destination, guarantees, reason for transfer	
<p>Meta Platforms (Facebook, Instagram) – USA – Privacy Policy / Data Privacy Framework https://hu-hu.facebook.com/privacy/policy https://www.dataprivacyframework.gov/list – parent company access</p>	
<p>YouTube – Google LLC – USA – Privacy Notice and General Terms / Data Privacy Framework https://policies.google.com/privacy?hl=hu&fg=1 https://www.dataprivacyframework.gov/list – data storage</p>	
<p>LinkedIn – USA – General Terms and Privacy Notice / Data Privacy Framework https://www.linkedin.com/legal/privacy-policy https://www.dataprivacyframework.gov/list – data storage</p>	
<p>TikTok Technology Limited – USA, Malaysia, Singapore – General Terms and Privacy Notice https://www.tiktok.com/legal/page/eea/privacy-policy/hu-HU – data storage</p>	
<p>Meta Platforms – USA – Privacy Policy / Data Privacy Framework https://hu-hu.facebook.com/privacy/policy https://www.dataprivacyframework.gov/list – parent company access</p>	

Joint processing takes place:	
Response	Name and registered address of joint controller(s)
Yes	<p>Meta Platforms (Facebook, Instagram) Meta Platforms Ireland Limited 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland – Social media</p> <p>Meta Platforms Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland – Communication platform operator</p>

Data Access and Security Measures:	
Access restriction	Only employees who strictly require access to personal data for the performance of their duties, as well as the managing director, may access such data.
Data security measures	<p>Regular backup of data stored on the server, Computers are password-protected, Monitor placement ensures protection against viewing by unauthorised persons, Password-protected Wi-Fi network, The network is protected by a firewall, Computers are protected by drive encryption, The company duplicates the content of the central server using an encrypted cloud-based service, Private use of IT devices is prohibited, Employees take over portable IT devices under a handover protocol,</p>

	Mandatory screen lock when an employee leaves their workstation, Each employee has their own company email account
--	---

3. Rights of the Data Subject:

Rights of the data subject applicable to the legal basis and their explanation

Right to be informed – The data subject is entitled to be informed of the manner in which their personal data are processed, even before the commencement of processing.

Right to rectification – The data subject is entitled to request rectification of their personal data stored with the controller, if those data do not correspond to reality and they are able to prove this.

Right of access – The data subject is entitled to obtain from the controller the personal data stored about them.

Right to erasure / right to be forgotten – The data subject is entitled to request the permanent deletion of their data, unless processing is based on the performance of a contract, compliance with a legal obligation, or exercise of official authority.

Right to withdraw consent – Where processing is based on consent, the data subject may withdraw their previously given consent at any time. Acceptance of the withdrawal request may also entail the deletion of data; however, if another legal basis also supports processing, processing shall cease only with respect to the particular processing purpose.

Right to restriction of processing – Where the data subject considers that the controller is not entitled to process their personal data, they may request the suspension of processing operations for the duration of the investigation.

Right to data portability – The data subject is entitled to receive the personal data stored about them in digital, tabular form.

Right to review of automated decision-making – The data subject is entitled to request a manual review of any processing operation in which the controller has applied automated decision-making with a legal or similarly significant effect on the data subject.

4. Exercising Data Subject Rights

Where a data subject has submitted a request to the controller regarding the exercise of the rights described in Section 3, the controller shall respond and inform the data subject about the measures taken in relation to the request without undue delay, but in any event within one month of receipt of the request. Where necessary, that period may be extended by a further two months.

Where the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay, but at the latest within one month 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 of seeking judicial remedy.

5. Lodging a Complaint

The data subject has the right to lodge a complaint with the data protection authority:

Name	Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) [National Authority for Data Protection and Freedom of Information]
Registered address	1055 Budapest, Falk Miksa utca 9-11.
Postal address	1363 Budapest, Pf.9.
Email	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400

Fax	+36 (1) 391-1410
Website	http://naih.hu

6. Judicial Redress

Provisions on judicial redress are contained in Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information.

The data subject may bring legal proceedings against the controller before a court if, in their view, the controller has infringed the rules on the processing of personal data. The action may be brought — at the data subject's choice — before the court having jurisdiction in the place of their domicile or place of residence. A party that would otherwise lack legal standing may also be a party to the proceedings. The data protection authority may intervene in the proceedings in favour of the data subject.

Any person who has suffered material or non-material damage as a result of an infringement of the General Data Protection Regulation is entitled to receive compensation from the controller or the processor for the damage suffered. The controller or processor shall be exempt from liability if it proves that it bears no responsibility whatsoever for the event giving rise to the damage.