

Privacy Notice

General Provisions

WeWifi Informatikai és Szolgáltató Korlátolt Felelősségű Társaság (hereinafter referred to as "WeWifi" or the "Company" or "Data Controller") issues this Privacy Notice to set out the provisions concerning the processing of personal data obtained in connection with the services it provides. With the issuance of this Notice, the Company aims to ensure the lawful recording and administration of data processing activities and the appropriate level of data security.

The Company is committed to protecting the personal data of its users and clients, and it considers the respect for its clients' right to informational self-determination to be of paramount importance. The Data Controller treats personal data confidentially and takes all necessary security, technical, and organizational measures to guarantee the highest level of protection for the personal data it handles. The Data Controller protects personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction or damage.

In formulating these rules, the Data Controller took special care to comply with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: "Infotv."), and Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR").

This Privacy Notice applies to all data processing activities involving natural persons carried out by the Company, particularly those performed on its websites (www.wewifi.hu and www.wewifi.eu). This Notice enters into force on the day of its publication on the Company's website, which is April 3, 2025. The Company reserves the right to unilaterally amend the Privacy Notice without prior notice to users.

The Data Controller processes only the data provided by users or specified by law for the purposes detailed below. For data processing based on voluntary consent, the user may withdraw their consent at any time during the data processing. The scope of processed personal data must be proportionate to the purpose of the processing and must not exceed it.

The Data Controller does not verify the personal data provided. The user is responsible for the accuracy and truthfulness of the data provided. The Data Controller is not liable for any damages resulting from incorrectly or intentionally falsely provided data, even if such inaccuracies could have been detected.

Only the Data Controller's authorized employees may process personal data in accordance with this Notice. The Data Controller will not disclose personal data to third parties except

for the Data Processors specified herein. The Data Processors may only act under contract with and based on the instructions of the Data Controller. They may engage further processors only with the Data Controller's consent.

Identity of the Data Controller

Company Name	WeWifi Informatikai és Szolgáltató Korlátolt Felelősségű Társaság
Registered Office / Mailing Address	1063 Budapest, Szinyei Merse utca 21. 1. em. 5.
Company Registration Number	Cg. 01-09-397254
Tax Number	7768808-2-42
EU Tax Number	HU27768808
Email Address	info@wewifi.hu
Phone Number	+36-20-367-9948

Data Protection Officer

The Company has not appointed a data protection officer. The Data Controller is not a public authority or body, its activities do not involve operations that require regular and systematic large-scale monitoring of users, nor does it process special categories of data or personal data relating to criminal convictions and offenses. Therefore, it is not required to designate a data protection officer.

Definitions

Personal data: any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person [GDPR Article 4].

Data subject (user): any natural person who is identified or identifiable based on personal data.

Consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them [GDPR Article 4].

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction [GDPR Article 4].

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. In this case, WeWifi is the Controller [GDPR Article 4].

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. In this document, processors may include ININET Kft. [GDPR Article 4].

Data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed [GDPR Article 4].

Websites: websites operated by the Controller including www.wewifi.hu and www.wewifi.eu.

Services: services provided and operated by the Controller accessible via the websites.

Scope of Processed Personal Data, Legal Basis, Purpose, Duration

Personal Data Provided via Contact Form

Personal Data	Purpose of Processing
Name	Required for making contact, maintaining communication, and identifying the user.
Email Address	Required for making contact and maintaining communication.
Phone Number	Required for making contact and maintaining communication.
Timestamp of Message	Technical operation.
IP Address at Time of Message	Technical operation.
Legal Basis for Processing	
The legal basis for processing the personal data provided via the contact form is the data subject's voluntary consent.	
Duration of Processing	
Until the consent is withdrawn by the data subject, a deletion request is made, or the Controller ceases its operations.	

Data Processors

Hosting Provider / IT Service Provider

Name of Processor	HOSTINGER operations, UAB
Registered Office	Švitrigailos str. 34, Vilnius 03230 Lithuania
Email Address	gdpr@hostinger.com.
Privacy Policy	https://www.hostinger.com/legal/privacy-policy
Service Provided by Processor	Hosting and server services.
Data Processed by Processor	Network identity of the data subject: IP address of the computer and software environment used, time of visit, and titles of visited pages.
Scope of Data Subjects	Natural persons visiting the website.
Purpose of Processing	To ensure the operation of the website.
Duration of Processing and Deadline for Deletion	Data recorded by the server operated by the hosting provider are stored until the website ceases operation, thereafter retained only in anonymized form for statistical purposes.
Legal Basis for Processing	Consent of the data subject.

Cookies

A cookie is a file or piece of information that is saved by the user's internet browser from the website and stored on the user's device. Cookies collect information about visitors and their devices and remember user preferences that can be reused later.

To provide a personalized experience, the Controller or the website operator places a small data packet known as a cookie on the user's computer (with their consent) and reads it during future visits. If the browser sends back a previously saved cookie, the service provider may link the current visit with the previous ones, but only with regard to its own content.

Cookies facilitate the use of the website by improving the user experience. Since the data recorded by cookies are not linked to personal data, the Controller does not process personal data through their use. The data are used exclusively for statistical purposes.

Cookies can only be placed and analyzed if the visitor consents via a pop-up message when the site loads. Even in such cases, the visitor's IP address is not stored due to an integrated plugin; all visits are anonymized.

Data automatically recorded by the system after accepting cookies includes:

- Domain name,
- Individual page settings,
- Date and time of visit,
- Login data,
- HTTP response code,
- Visited pages,
- Operating system and version,
- Browser and version,
- Screen resolution.

Types of cookies:

Session cookies: Allow smooth and full browsing and use of website features and services. These cookies are deleted automatically once the browser is closed.

Persistent cookies: Used each time the user visits the site. They track user navigation and behavior and may be used by features like Google Analytics. These cookies do not contain personal data and cannot identify the visitor.

Cookies can be deleted by the user or disabled via browser settings (typically under Privacy/Settings > Cookies). Disabling cookies may limit full functionality. If accepted and not deleted, cookies are automatically erased after 180 days.

Rights of Data Subjects

Right of Access: Data subjects may request information about whether their personal data is being processed and, if so, the scope, source, purpose, legal basis, and duration of processing. The Controller shall respond within 30 days.

Right to Rectification: Data subjects may request correction or completion of inaccurate or incomplete data. The Controller shall respond within 30 days.

Right to Erasure: Data subjects may request the deletion of their data when consent is withdrawn or if data processing is otherwise unlawful or unnecessary. The Controller shall act within 30 days.

Right to Restriction of Processing: Data subjects may request restriction under specific conditions (e.g., if data accuracy is contested, processing is unlawful, or the data is needed for legal claims).

Right to Data Portability: Data subjects may receive their data in a structured, commonly used, machine-readable format and transmit it to another controller.

Right to Object: Data subjects may object to data processing, and the Controller shall examine the objection within 15 days and notify the user.

Enforcement Options Related to Data Processing

Requests and complaints related to the above rights may be sent to the Company's mailing or email address listed above.

If the data subject believes their rights have been violated, they may file a lawsuit against the Controller. Proceedings shall be conducted by the competent regional court of the Controller's headquarters or optionally the data subject's residence.

Complaints may also be filed with the Hungarian National Authority for Data Protection and Freedom of Information:

Name (in English)	Hungarian National Authority for Data Protection and Freedom of Information
Name (in Hungarian)	Nemzeti Adatvédelmi és Információszabadság Hatóság
Address	1125 Budapest, Szilágyi Erzsébet fasor 22/C
Mailing Address	1530 Budapest, P.O. Box 5.
Email Address	ugyfelszolgalat@naih.hu
Website	http://www.naih.hu
Phone Number	+36 (1) 391-1400
Fax Number	+36 (1) 391-1410