

PRIVACY POLICY

Last updated: November 2018

Data Protection Declaration of Mag. Flora Varga, Hartlgasse 37-39/2, 1200 Vienna, Austria, ("I"), concerning the website www.varga-supervision.at ("Website").

The following declaration is intended to provide you with comprehensive information on how I deal with your data and what rights you have. The protection of your privacy is very important to me and I would like to inform you correspondingly about your rights and possibilities in order to effectively support a trusting business relationship. My data protection practice is in accordance with the General Data Protection Regulation of the European Union ("GDPR") in conjunction with the Austrian Data Protection Adaptation Act 2018 ("DSG"), the Telecommunications Act (TKG) and other relevant legal provisions.

Data protection laws are generally relevant in case any processing of personal data is concerned. The terms used within the scope of this data protection declaration are defined in and by the GDPR. As such, the wide definition of "processing" of personal data means any operation or set of operations performed on personal data, such as, but not limited to, recording, organization, storage, alteration, and transmission of personal data. Any information allowing me or third parties, in a review or by additional knowledge, to potentially identify you in person can be considered personal data.

This Data Protection Declaration refers exclusively to the above-mentioned website. If you are forwarded to other websites via links on my Website, please inform yourself directly on the target page about the respective handling of your personal data. I cannot assume any responsibility or liability for the content of third party websites that are linked via my Website.

As far as personal data (for example name, address or e-mail addresses) is collected on my pages, this is always on a voluntary basis as far as possible. This data will not be passed on to third parties without your explicit consent.

I would like to point out that data transmission on the Internet (e.g. communication by e-mail) may be subject to security gaps. A complete protection of the data against access by third parties is not possible.

1. **Processing of Data related to the use of my Website**

When visiting my website, I collect the following data: IP-address.

You can visit my website without providing any personal information. By accessing my Website, specific data regarding the access (your IP-address and additional metadata relating to your surfing behavior such as date and time of retrieval, requesting provider) will be processed. This data processing is for the purpose of security and improvement of the quality of my offer and is based on Art 6 para 1 lit f GDPR (overriding legitimate interests, i.e. achieving the above mentioned purposes). However, this information does not allow me to draw any conclusions about your person. IP addresses are collected and stored by shortening the last three (3) digits exclusively in anonymous form. As a mere website visitor you can inform yourself about my offers and activities without obligation.

2. Rights of the Data Subject

A central aspect of data protection regulations is the implementation of adequate opportunities to allow for the disposition of personal data, even after the processing of said personal data has occurred. For this purpose, a series of rights of the data subject are set in place. I shall comply with your corresponding requests to exercise your rights without undue delay and in any event within one month of receipt of the request. Please address your request to the following address: flora(at)varga-supervision.at. Specifically, the following rights are entailed:

- a) Should you exercise your **right to information**, I shall provide you with all relevant information regarding the processing of your personal data by me, permitted to the extent of the law. For this purpose, I will send you (i) copies of the data (e-mails, database excerpts, etc.), as well as information on (ii) concretely processed data, (iii) processing purposes, (iv) categories of processed data, (v) recipients, (vi) the storage period or the criteria for determining it, (vii) the origin of the data and (viii) any further information depending on the individual case. Please note, however, that I cannot hand over any documents that could impair the rights of other persons.
- b) With the **right to rectification** you may request that I rectify wrongly recorded data, data that has become inaccurate or incomplete personal data (for the purpose of the respective processing). Your request will then be examined and the data processing affected may be restricted for the duration of the examination upon request.
- c) The **right to (data) erasure** may be exercised (i) in the absence of a need with regard to the purpose of processing, (ii) in the event of revocation of a consent given by you, (iii) in the event of special objection, insofar as the data processing concerned is based on the legitimate interests of me, (iv) in the event of unlawful data processing, (v) in the event of a legal obligation to erase, and (vi) in the event of data processing by minors under the age of 16.
- d) A **right to restriction of processing**, after the exercise of which affected data may only be stored, exists (only) in special cases. In addition to the possibility of restricting the duration of data corrections, (i) unlawful data processing (unless deletion is required) and (ii) the duration of the examination of a particular objection request are also covered.
- e) A **right to data transfer**, after the exercise of which the data concerned may be obtained in a structured, common and machine-readable format and communicated to another responsible party.
- f) You also have the **right to object** to data processing at any time. However, this only applies if the processing is based on my legitimate interests.
- g) You have the **right to lodge a complaint** with a relevant national supervisory authority. (see point 5)

Please also note that I may be unable to comply with your request due to compelling reasons worthy of protection for the processing (weighing of interests) or a processing due to the assertion, exercise or defense of legal claims (on my part). The same applies in the case of excessive requests, whereby here as well as in the case of descendants of manifestly unfounded requests a fee may be charged.

3. Data Security, Data Erasure

I take all appropriate technical and organizational measures to ensure that only those personal data are processed by default whose processing is absolutely necessary for the business purpose. The measures I have taken cover the amount of data collected, the scope of processing as well as their storage period and accessibility. With these measures, I ensure that personal data is only made accessible to a limited and necessary number of persons through default settings. Other persons will under no circumstances be granted access to personal data without the explicit consent of the person concerned. In addition, I use various protection mechanisms (backups, encryption) to secure the appearance of the website and

other systems. This is intended to protect your (personal) data as best as possible against loss or theft, destruction, unauthorized access, alteration and distribution.

In accordance with the provisions of the GDPR, all (personal) data collected by me via the website will only be stored for as long as it is required with regard to the legal basis of the processing, unless longer-term storage is provided for by law. I comply with my obligation to delete data on the basis of my specific internal deletion concept, and I can provide you with further information on request.

Insofar as contract processors are deployed by me, they are also obliged to comply with all applicable data protection regulations on the basis of specific framework agreements. In addition, when handling your (personal) data, they are strictly bound by my specifications in particular with regard to type and scope.

4. Cookies

My Website uses "cookies". Cookies are small text files, which are stored on your computer when accessing my Website in order to make my services more user-friendly, more attractive and safer. Above all, only the resolution is stored, thus enabling an ideal display of the website (adapted to the end device). In many cases these are "session cookies", which are deleted without your intervention as soon as you close your current browser session. Other cookies (e.g. to save your language settings) remain for a longer period of time or until you manually remove them. Cookies generally do not contain any personal data.

Most browsers automatically accept cookies. However, you have the option to customize your browser settings so that cookies are either generally declined or only allowed in certain ways (e.g., limiting refusal to third party cookies). However, if you change your browser's cookie settings, my site may no longer be fully usable. The setting options for the most common browsers can be found under the following links:

Internet Explorer™: <https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies>

Edge™: <https://www.netzwelt.de/news/155267-microsoft-edge-cookies-blockieren-verwalten-loschen.html>

Safari™: <https://www.verbraucher-sicher-online.de/anleitung/cookies-verwalten-in-apple-safari>

Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=de&hlrm=en&answer=95647>

Firefox™ <https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>

Opera™: <http://help.opera.com/Windows/10.20/de/cookies.html>

5. Right of Appeal

If you take the view that I violate applicable data protection laws when processing your data, you have the right to file a complaint with the Austrian Data Protection Authority. The requirements for such a complaint are based on Section 24 ff of the Austrian Data Protection Act (DSG). However, I would ask you to contact me in advance in order to clarify any questions or problems. The contact details of the data protection authority are as follows:

Austrian Data Protection Authority, Wickenburggasse 8, 1080 Vienna, Austria

Phone: +43 1 52 152-0

E-Mail: dsb@dsb.gv.at

6. **Contact Details regarding Data Protection Issues**

For data protection questions, messages or requests, please use the following contact address:

Mag. Flora Varga, Hartlgasse 37-39/7, 1200 Vienna, Austria

Phone: +43 650 787 37 50

E-Mail: [flora\(at\)varga-supervision.at](mailto:flora(at)varga-supervision.at)