

PRIVACY POLICY

Pasaréti Ski School and Normafa Ski School

Effective date: 1 August 2026

1. Introduction

Wintersport Kft. (hereinafter referred to as the “Data Controller”) is committed to processing personal data lawfully, fairly and transparently.

This Privacy Policy explains what personal data we process in connection with the services provided by Pasaréti Ski School and Normafa Ski School, for what purposes, on what legal bases, for how long, and what rights individuals have in relation to their personal data.

We process personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, GDPR), applicable Hungarian legislation on informational self-determination, and other relevant laws.

2. Details of the Data Controller

Company name: Wintersport Kft.

Registered office: 1037 Budapest, Csillaghegyi út 36., Hungary

Operating locations:

Pasaréti Ski School 1026 Budapest, Pasaréti út 11–13., Hungary

Normafa Ski School 1121 Budapest, Eötvös út 50., Hungary

Email: siiskola@wintersport.hu

3. Principles of Data Processing

The Data Controller processes personal data:

- Lawfully;
- Fairly;
- Transparently;
- Exclusively for specified purposes;
- Only to the extent necessary for the purposes of processing;
- With appropriate security measures in place.

The Data Controller aims to process only personal data genuinely necessary for providing its services.

4. What Personal Data Do We Process?

Depending on the type of service, we may process the following categories of personal data.

Identification data

- Name
- Date of birth
- Gender

Contact information

- Email address
- Telephone number
- Residential address (where necessary)

Booking information

- Booked appointments
- Lesson passes
- Purchases
- Payment status
- Attendance history

Sports-related information

- Skiing or snowboarding proficiency level
- Instructional preferences
- Selected sport
- Group allocation

Health-related information

Information provided exclusively for the purpose of ensuring safe participation in sports activities.

For example:

- Allergies
- Medication sensitivities
- Chronic illnesses
- Injuries
- Emergency contact details

The Data Controller processes Hungarian social security identification numbers (TAJ numbers) only where required by law or in specifically justified circumstances.

Technical data

Data automatically generated when using our website, such as:

- IP address
- Browser type
- Operating system
- Time of visit
- Pages visited

- Cookie identifiers

Payment information

The Data Controller does not process bank card details during online payments.

Such information is processed exclusively by the payment service provider.

5. Purposes of Data Processing

We process personal data primarily for the following purposes.

Provision of services

- Registration
- Booking appointments
- Management of lesson passes
- Conducting lessons
- Organising camps

Communication

- Scheduling appointments
- Sending notifications
- Communicating changes
- Customer support

Payments and invoicing

- Online payments
- Issuing invoices
- Compliance with accounting obligations

Safety and security

- Processing health-related information
- Operating CCTV systems
- Documenting accidents

Marketing

Only where an appropriate legal basis exists.

For example:

- Newsletters
- Promotion of events
- Photographs
- Videos

Compliance with legal obligations

Fulfilment of obligations prescribed by law.

6. Legal Bases for Data Processing

The Data Controller processes personal data on one of the following legal bases:

- Performance of a contract;
- Compliance with a legal obligation;
- Consent of the data subject;
- Legitimate interests of the Data Controller;
- Protection of vital interests (for example, in a medical emergency).

7. Data Retention Periods

We process personal data only for as long as necessary to fulfil the purpose of processing or as required by law.

The anticipated retention periods for specific processing activities are as follows:

Purpose of processing	Retention period
User account	Until the account is deleted
Bookings	5 years after the service has been provided
Invoicing data	8 years
Contact enquiries	Maximum 2 years
Newsletters	Until unsubscribing
CCTV recordings	Maximum 30 days
Photographs and video recordings	For as long as the purpose exists, or until consent is withdrawn / the legitimate interest has been reassessed
Accident documentation	In accordance with applicable legislation

Once the purpose of processing has ceased, personal data will be deleted or anonymised unless otherwise required by law.

8. Who Can Access Personal Data?

Personal data may only be accessed by employees whose duties require such access.

The data processors identified in this Privacy Policy may also participate in the processing of personal data.

The Data Controller implements appropriate technical and organisational measures to prevent unauthorised access to personal data.

9. Data Processors

The Data Controller uses external service providers to operate certain services.

These providers may process personal data only for purposes determined by us and in accordance with applicable data protection legislation.

Service	Data processor
Online user accounts and authentication	Clerk
Online database	Supabase
Online payments	Stripe
Email delivery	Resend
Newsletters	MailerLite
Website hosting	Vercel
Web analytics	Google Analytics
Invoicing	Számlázz.hu
Invoice automation	SzámlaBridge

The Data Controller may update the list of data processors as necessary.

10. Disclosure of Personal Data

The Data Controller discloses personal data to third parties only in the following circumstances:

- Where required by law;
- In response to requests from public authorities;
- In connection with court proceedings or other official procedures;
- With the consent of the data subject;
- To data processors necessary for the provision of services.

The Data Controller does not sell personal data for commercial purposes.

11. CCTV Surveillance

CCTV systems operate at Pasaréti Ski School and Normafa Ski School for the purposes of property protection, accident prevention and security.

The purposes of processing CCTV recordings include:

- Protection of individuals and property;
- Clarification of the circumstances surrounding accidents;

- Resolution of legal disputes;
- Ensuring the safe operation of the facilities.

CCTV recordings are retained for a maximum of 30 days and are subsequently deleted automatically, unless a longer retention period is required by law or official proceedings.

12. Photography, Audio and Video Recordings

The Service Provider may take photographs and make audio and video recordings during lessons, sports camps, competitions, open days and other events.

The purposes of creating and using such recordings include, in particular:

- Documenting programmes and events;
- Presenting the activities of Pasaréti Ski School and Normafa Ski School;
- Marketing and communication activities of the ski schools;
- Creating content for websites, social media platforms and other informational materials;
- Maintaining the ski schools' archives.

12.1. Documentation of Events and Lessons

Where photographs or recordings are taken for the general documentation of lessons, camps, competitions and other events, and participants appear as members of a group or as a natural part of the event, the legal basis for processing is the legitimate interest of the Data Controller.

The Data Controller has a legitimate interest in documenting its activities, presenting its services and providing authentic information about the operation of the ski schools to current and prospective customers.

The Data Controller always endeavours to ensure that recordings are not offensive, humiliating or detrimental to participants.

12.2. Recordings Specifically Intended for Marketing

Where the primary purpose of a recording is to prominently feature a particular individual — especially in portrait photographs, advertising campaigns, promotional videos or other marketing materials in which the individual is specifically identifiable — personal data will be processed only with the prior consent of the individual concerned or, in the case of a minor, their parent or legal guardian.

Consent may be withdrawn at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

12.3. Recordings of Minors

The Service Provider exercises particular care when processing photographs and recordings of minors.

When creating and using such recordings, we always endeavour to ensure that they:

- Respect the dignity of the child;
- Are not offensive or humiliating;
- Do not place the child at a disadvantage;
- Are used only in a manner appropriate to the activities of the ski schools.

12.4. Objections and Withdrawal of Consent

Where the legal basis for processing a recording is the legitimate interest of the Data Controller, individuals who do not wish to appear in such recordings have the right to object to the processing.

Where processing is based on consent, the individual concerned or, in the case of a minor, their legal guardian may withdraw consent at any time.

Objections or withdrawals of consent may be submitted to:

- siiskola@wintersport.hu

The Data Controller assesses each request individually and, unless prevented by law or another legitimate interest, takes action without undue delay.

13. Newsletters

The Data Controller sends electronic newsletters only where an appropriate legal basis exists under applicable legislation.

Recipients may unsubscribe at any time without providing a reason:

- By using the unsubscribe link included in the newsletter;
- By sending an email to the Data Controller.

Unsubscribing does not affect the lawfulness of previous data processing.

14. Cookies and Web Analytics

The Service Provider's website uses cookies and similar technologies to ensure the proper and secure operation of the website, manage user sessions and logins, and — subject to the user's prior consent — conduct statistical analyses.

The Service Provider may use Google Analytics to analyse website traffic and usage.

The purposes of such analyses include:

- Improving the website;
- Identifying technical issues;
- Enhancing the user experience;
- Measuring the popularity and usage of services.

Cookies used for statistical purposes are activated only after the user has given prior consent.

Further information regarding the types of cookies, their purposes, legal bases, retention periods, and the methods of granting and withdrawing consent is provided in the separate Cookie Policy.

15. Data Security

The Data Controller implements all reasonably expected technical and organisational measures to protect personal data, particularly against:

- Unauthorised access;
- Unauthorised modification;
- Loss;
- Destruction;
- Unauthorised disclosure;
- Other forms of unauthorised processing.

The security measures in place are reviewed regularly.

16. Rights of Data Subjects

Under applicable data protection legislation, individuals have, in particular, the following rights.

Right to information

Individuals have the right to request information about whether the Data Controller processes personal data relating to them.

Right of access

Individuals have the right to access their personal data processed by the Data Controller and obtain information about the circumstances of processing.

Right to rectification

Individuals may request the correction of inaccurate or incomplete personal data.

Right to erasure

Individuals may request the deletion of their personal data where the legal conditions for erasure are met.

Erasure cannot always be carried out, particularly where the retention of data is required by law.

Right to restriction of processing

Individuals have the right to request the restriction of processing of their personal data in circumstances specified by law.

Right to data portability

Individuals have the right to receive personal data they have provided in a structured, commonly used and machine-readable format and may request that such data be transferred to another data controller, where the applicable legal conditions are met.

Right to object

Individuals have the right to object to the processing of their personal data where the legal basis for processing is the legitimate interest of the Data Controller.

Withdrawal of consent

Where processing is based on consent, individuals have the right to withdraw their consent at any time.

Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.

17. Handling Data Subject Requests

Individuals may submit requests concerning their personal data to the following email address:

siiskola@wintersport.hu

The Data Controller will review and respond to requests without undue delay and no later than the deadline prescribed by applicable legislation.

18. Complaints and Legal Remedies

If an individual believes that the processing of their personal data violates applicable legislation, they have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) or seek a judicial remedy.

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

Address: 1055 Budapest, Falk Miksa utca 9–11., Hungary

Postal address: 1363 Budapest, P.O. Box 9, Hungary

Email: ugyfelszolgalat@naih.hu

Website: www.naih.hu

19. Amendments to the Privacy Policy

The Data Controller reserves the right to amend this Privacy Policy unilaterally, particularly in the following circumstances:

- Changes in legislation;
- Introduction of new services;
- Introduction of new purposes for data processing;
- Engagement of new data processors;
- Technological developments.

The current version of the Privacy Policy is available on the Service Provider's website.

20. Entry into Force

This Privacy Policy enters into force on 1 August 2026 and remains valid until withdrawn or amended.

Upon its entry into force, all previous privacy policies of the Service Provider cease to be effective.