

# PRIVACY POLICY

**Last updated:** 18/03/2026

## 1. Introduction

Orgyán Kristóf Attila E.V. ("we," "our," "us") operates the Unravel Retune website and audio resampling service (the "Service"). We are committed to protecting your privacy in accordance with the General Data Protection Regulation (GDPR) and applicable Hungarian data protection laws.

This Privacy Policy explains what data we collect, why we collect it, and your rights regarding your personal data.

## 2. Data Controller Contact Information

As required by Article 13(1)(a) of the GDPR , the contact details of the data controller are:

**Orgyán Kristóf Attila E.V.**  
**Sáfrány utca 50. em.: 2. ajtó: 28/A.**  
**Budapest, 1116, Hungary**  
**Email: support@unravel.hu**

For all data protection inquiries, including requests to exercise your rights under GDPR, please contact us at the email address above.

## 3. What Personal Data We Collect

When you use Unravel Retune, our servers automatically collect standard log information :

Data Category	Specific Data Collected
<b>IP Address</b>	Your device's public IP address (considered personal data under EU law - <i>Breyer v Germany</i> C-582/14)
<b>Browser Information</b>	Browser type and version, operating system
<b>Access Times</b>	Date and time of access, timestamps of file uploads and downloads
<b>Usage Data</b>	Pages visited, session identifiers

Data Category	Specific Data Collected
<b>Uploaded Files</b>	Audio files you upload for resampling (temporarily)

**We do not** collect names, email addresses, phone numbers, or any account information. We do not use cookies for tracking or marketing purposes .

#### 4. How We Use Your Data (Purpose of Processing)

We process your personal data for the following purposes :

Purpose	Description
<b>Service Delivery</b>	To deliver the website to your device (requires temporary storage of IP address for the duration of your session)
<b>Technical Administration</b>	To ensure the functionality, stability, and security of our systems
<b>Security &amp; Abuse Prevention</b>	To detect and prevent attacks, unauthorized access, and misuse of the Service
<b>Network Security</b>	To maintain network and information security as recognized by Recital 49 GDPR
<b>Repeat Infringer Identification</b>	To log IP addresses associated with substantiated copyright infringement notices (where technically feasible)

**We do not** use your data for:

- Marketing or advertising purposes
- Automated decision-making or profiling
- Selling or renting your data to third parties

#### 5. Legal Basis for Processing

Our processing of your personal data is based on :

- **Article 6(1)(f) GDPR - Legitimate Interests:** Our legitimate interests in ensuring network and information security, maintaining system functionality, and

preventing abuse of our Service . This is explicitly recognized as a legitimate interest by Recital 49 GDPR .

- **Article 6(1)(b) GDPR - Performance of a Contract:** To provide the resampling service you request when you upload files .

## 6. Data Retention

We adhere to the principle of storage limitation (Article 5(1)(e) GDPR) :

Data Type	Retention Period
<b>Uploaded original files</b>	Deleted immediately after processing is complete
<b>Processed files</b>	Deleted immediately after download, or automatically after 12 hours from upload
<b>Server log data</b>	<b>Up to 4 weeks (28 days)</b> , then automatically rotated and deleted
<b>Backup data</b>	Deleted within 30 days

**Exceptions:** In the case of a substantiated security incident or copyright infringement, relevant log data may be retained longer as necessary for investigation, legal proceedings, or compliance with legal obligations. Any such extended retention will be limited to what is strictly necessary .

## 7. Data Sharing and Recipients

We do not sell, trade, or rent your personal data to third parties.

Your data may be accessible to:

- **Strictly limited server administrators** employed by Orgyán Kristóf Attila E.V. for maintenance, security, and troubleshooting purposes. All administrator access is logged and audited .
- **Hosting provider:** Contabo GmbH, Welfenstrasse 22, 81541 Munich, Germany - who processes data on our behalf as a data processor .

When you communicate with other services or users through the Internet, your data (including IP address) is transmitted through various networks and systems beyond our control .

## 8. International Data Transfers

Our servers are located within the European Union. We do not actively transfer your personal data outside the EU/EEA. If our hosting or processing involves transfers outside the EU, we ensure appropriate safeguards (such as Standard Contractual Clauses) are in place .

## 9. Your Rights Under GDPR

As a data subject, you have the following rights under Articles 15-22 GDPR :

Right	Description
<b>Right of Access (Art. 15)</b>	Request confirmation of whether we process your data and receive a copy
<b>Right to Rectification (Art. 16)</b>	Request correction of inaccurate data
<b>Right to Erasure (Art. 17)</b>	Request deletion of your data ("right to be forgotten")
<b>Right to Restriction (Art. 18)</b>	Request restriction of processing
<b>Right to Data Portability (Art. 20)</b>	Receive your data in a structured, machine-readable format
<b>Right to Object (Art. 21)</b>	Object to processing based on legitimate interests
<b>Right to Withdraw Consent</b>	Where processing is based on consent, withdraw at any time

**How to exercise your rights:** Contact us at [support@unravel.hu](mailto:support@unravel.hu). To identify you, we may need to request additional information (such as your IP address and approximate time of use) as we do not maintain accounts. We will respond within one month .

## 10. Right to Lodge a Complaint

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the supervisory authority :

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

Website: [www.naih.hu](http://www.naih.hu)

Address: 1055 Budapest, Falk Miksa utca 9-11, Hungary

Phone: +36 (1) 391-1400

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

### **11. Security Measures**

We implement appropriate technical and organizational measures under Article 32 GDPR , including:

- Encrypted connections (HTTPS/TLS) for all data transmission
- Strictly limited administrator access with logging and auditing
- Automated deletion systems verified periodically
- Secure session management
- Regular evaluation of security measures

### **12. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. If changes are material, we will notify you by posting a notice on our website. The "Last updated" date at the top of this policy reflects the most recent changes .

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### **IMPRESSUM (Hungarian Legal Imprint)**

\*Required under the Hungarian E-commerce Act (2001. évi CVIII. törvény) \*

**Szolgáltató neve:** Orgyán Kristóf Attila E.V.

**Székhelye:** Sáfrány utca 50. em.: 2. ajtó: 28/A., 1116 Budapest, Magyarország

**Elérhetősége:** [support@unravel.hu](mailto:support@unravel.hu)

**Nyilvántartási szám:** 59209988

**Adószám:** 90070473-1-43 (EU VAT: HU90070473)

**Nyilvántartó hatóság:** 43-Dél-budapesti Adó- és Vámigazgatósága

### **Tárhelyszolgáltató (Hosting Provider):**

Contabo GmbH

Welfenstrasse 22

81541 Munich

Germany

**Tel:** +49 89 3564717 70

**Fax:** +49 89 216 658 62

**Email:** [info@contabo.com](mailto:info@contabo.com)