

# Privacy Policy

## Data Management

### Data Manager

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hosting Provider

Name: unas.hu

Description of Data Management During Webshop Information on the use of cookies

What is a cookie?

The Data Controller uses so-called cookies when visiting the website. A cookie-alphanumeric information packet sent by our website to your browser in order to save certain settings, to facilitate our use of the website and to collect some relevant statistical information about our visitors.

Some cookies do not contain personal information and are not capable of identifying an individual user, but some contain a unique identifier - a secret, randomly generated number - that is stored on your device, which also ensures that you are identifiable. The duration of each cookie is described in the respective cookie description.

Legal background and legal basis for cookies:

The legal basis for the processing of the data is your consent under Article 6 (1) (a) of the Regulation.

The main features of cookies used by this website are:

**Google Adwords cookie** When a visitor visits our site, the visitor's cookie ID is added to the remarketing list. Google uses cookies, such as NID and SID cookies, to customize ads on Google products, such as Google Search. For example, you use such cookies to remember your recent searches, your previous interactions with each advertiser's ads or search results, and your visits to advertiser websites. AdWords Conversion Tracking uses cookies. To track sales and other conversions resulting from an ad, it saves cookies on the user's computer when that person clicks on an ad. Some common uses of cookies are: choosing ads based on what is relevant to a particular user, improving reporting on campaign performance, and avoiding ads that the user has already viewed.

**Google Analytics Cookie:** Google Analytics is a Google analytics tool that helps website and app owners get a more accurate picture of their visitors' activity. The Service may use cookies to collect information and report statistics about your use of the Website without personally identifying your visitors to Google. The main cookie used by Google Analytics is the "\_\_ga" cookie. In addition to reporting website usage statistics, Google Analytics, along with some of the advertising cookies described above, can also be used to serve more relevant ads on Google products (like Google Search) and across the web.

**Remarketing cookies:** May appear to previous visitors or users when browsing other sites on the Google Display Network, or when searching for terms related to your products or services

**Cookies to improve the user experience:** These cookies collect information about the user's use of the site, such as which pages you visit most often or error messages you receive from the site. These cookies do not collect visitor-identifying information, so they work with general, anonymous information. The data obtained from these are used to improve the performance of the website. The lifetime of these types of cookies is limited to the duration of the session.

If you do not accept the use of cookies, certain features will not be available to you. For more information about deleting cookies, visit the following links:

Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>

Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Mozilla: <https://support.mozilla.org/en-US/kb/websites-alternated-sutik-torlese-szamito>

Safari: [https://support.apple.com/kb/ph21411?locale=en\\_US](https://support.apple.com/kb/ph21411?locale=en_US)

Chrome: <https://support.google.com/chrome/answer/95647>

Data processed for contracting and performance purposes

There may be several cases of data management in order to conclude and fulfill the contract. Please be advised that any data processing related to complaint and warranty management will only take place if you exercise any of these rights.

If you are not a purchaser through the webshop but only a visitor to the webshop, you may be subject to the terms of your marketing data management as long as you provide us with a marketing consent.

More detailed data management for contracting and performance:

Contact

For example, if you contact us about a product via email, contact form, or phone.

Pre-contact is not required, and you can leave it at any time from the webshop.

Managed data

Name, address, telephone number.

Duration of data management

The data will only be processed until the contact is completed. Legal basis for data management

Your voluntary consent to contact the Data Controller by contacting. [Data management pursuant to Article 6 (1) (a) of the Regulation]

Registration on the website

By storing the data provided during the registration, the Data Controller can provide a more convenient service (eg the data of the data subject need not be re-entered at the time of purchase). Registration is not a prerequisite for signing a contract

During the data processing, Data Controller manages your name, address, telephone number, e-mail address, the characteristics of the purchased product and the date of purchase.

Duration of data management

Until your consent is withdrawn.

Legal basis for data management

Your voluntary consent to the Data Controller upon registration [Data Management according to Article 6 (1) (a) of the Regulation]

Order processing

Processing of orders requires data management activities to fulfill the contract Managed data

In the course of data management, Data Controller manages your name, address, telephone number, e-mail address, product characteristics of the purchased product, order number and date of purchase.

If you have placed an order in the webshop, data management and data entry is essential for the performance of the contract.

Duration of data management

The data will be processed for 5 years according to the civil statute of limitations.

Legal basis for data management

Performance of the contract. [Data management pursuant to Article 6 (1) (b) of the Regulation]

Invoice issue

The data management process is performed in order to issue a statutory invoice and to fulfill the obligation to keep accounting documents. The St. Pursuant to Article 169 (1) to (2), companies must keep accounting documents in support of their accounting, either directly or indirectly.

Managed data

Name, address, email address, phone number.

Duration of data management

The invoices issued are in accordance with St. Pursuant to Article 169 (2), it must be kept for 8 years from the date of issue of the invoice.

Legal basis for data management

Act CXXVII of 2007 on Value Added Tax Under Article 159 (1), the issue of an invoice is mandatory and must be retained for 8 years pursuant to Article 169 (2) of Act C of 2000 on Accounting [data management pursuant to Article 6 (1) (c) of the Regulation].

Data management related to freight transport

The data management process takes place to deliver the ordered product.

Managed data

Name, address, email address, phone number.

Duration of data management

The Data Controller shall process the data until the delivery of the ordered goods.

Legal basis for data management

Execution of the contract [Data management pursuant to Article 6 (1) (b) of the Regulation].

Guarantee service

The data management process is in place to handle warranty claims. If you have requested warranty service, data management and data entry is essential.

Managed data

Customer name, phone number, email address, complaint content.

Duration of data management

Warranty claims are retained for 5 years under the Consumer Protection Act.

Legal basis for data management

Whether or not you will be contacted is your voluntary decision in the event of a warranty claim, but if so, the 1997 CLV on Consumer Protection. 17 / A. (7), we are obliged to keep the complaint for 5 years [Data management pursuant to Article 6 (1) (c) of the Regulation]

Treatment of other consumer complaints

The data management process is in place to deal with consumer complaints. If you have contacted us with a complaint, it is essential that you manage and provide data.

Managed data

Customer name, phone number, email address, complaint content.

Duration of data management

Warranty claims are retained for 5 years under the Consumer Protection Act.

Legal basis for data management

Whether or not you are complaining about your voluntary decision, but if you do, the 1997 CLV on Consumer Protection. 17 / A. (7), we are obliged to keep the complaint for 5 years [data management pursuant to Article 6 (1) (c) of the Regulation].

Data processed in relation to the verifiability of the consent

During the registration, ordering, signing up for the newsletter, the IT system will store the information related to the consent for later verification. Managed data

Date of consent and IP address of the person concerned.

Duration of data management

Due to legal requirements the consent has to be verified at a later date, therefore the period of data storage is stored for a period of time after the termination of data management.

Legal basis for data management

Article 7 (1) of the Regulation requires this obligation. [Data management pursuant to Article 6 (1) (c) of the Regulation]

Data management for marketing purposes

Data management for newsletter sending

Managed data

Name, address, email address, phone number.

Duration of data management

Until the consent of the data subject is withdrawn.

Legal basis for data management

Your voluntary consent to the Data Controller by subscribing to the Newsletter [Data Management according to Article 6 (1) (a) of the Regulation]

Data management relating to the sending and display of personalized advertisements

Managed data

Name, address, email address, phone number.

Duration of data management

Until your consent is withdrawn.

Legal basis for data management

Your voluntary specific contribution to the Data Controller at the time of recording [Data Management according to Article 6 (1) (a) of the Regulation]

remarketing

Data management as a remarketing activity is implemented through cookies.

Managed data

Information handled by the cookies specified in the cookie notice.

Duration of data management

The data storage period for this cookie, more information is available here:

Google General Cookie Information: <https://www.google.com/policies/technologies/types/>

Google Analytics Brief: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=en> Facebook Brief:

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)

Legal basis for data management

Your voluntary consent to the Data Controller using the Website [Data Management under Article 6 (1) (a) of the Regulation].

Raffle

The data management process is conducted for the purpose of conducting the lottery.

Managed data

Name, email address, telephone number.

Duration of data management

The data will be deleted after the end of the sweepstakes, except for the data of the winner, which the Data Controller is obliged to retain for 8 years under the Accounting Act.

Legal basis for data management

Your voluntary consent to the Data Controller using the Website. [Data management pursuant to Article 6 (1) (a) of the Regulation]

Further data management

If the Data Controller wishes to carry out further data processing, it shall provide prior information on the essential circumstances of data processing (legal background and legal basis of data processing, purpose of data processing, scope of data processed, duration of data processing).

Please be advised that any written requests for authority data from the authorities must be complied with by the Data Controller. Data Controller on data transfers is provided in Infotv. In accordance with Article 15 (2) - (3), it shall keep records (to which authority, what personal data, on what legal basis, when the Data Controller was transmitted), the content of which shall be provided by the Data Controller upon request, unless its disclosure is prohibited by law.

Your use of a data processor and their data management activities

Processing of personal data

The processor is called Shopify.com

The Data Processor stores personal data on the basis of a contract with the Data Controller. You are not entitled to access personal information.

Data processing activities related to freight transport

The name of the data processor is: pakkuldo.hu

The Data Processor participates in the delivery of the ordered goods on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor may manage the name, address and telephone number of the customer until the end of the calendar year following the date of dispatch of the postal item and thereafter delete it immediately.

The name of the data processor is Szamlazz.hu

Registered office: 1031 Budapest, Záhony utca 7.

The processor's telephone number is +3630 35 44 789

The e-mail address of the data processor is info@szamlazz.hu

The Data Processor participates in the registration of accounting documents on the basis of the contract concluded with the Data Controller. In doing so, the Data Processor shall, to the extent necessary for the accounting records, name and address of the data subject, in accordance with St. It shall be treated for a period consistent with Article 169 (2) and thereafter canceled.

data transmission

The www.arukereso.hu (Naspers OCS Hungary Kft. 1074 Budapest, Rákóczi út 70-72., Tax number: 24868291-2-42, Company registration number: 01-09-186759) After the purchases made here, the purchaser operates in order to operate the Trusted Shop program Your e-mail address and the name of the product you purchase will be forwarded to arukereso.hu. Purpose of Data Transfer: Requesting and displaying customer feedback. The personal data transmitted in this way will be handled by Naspers OCS Hungary Ltd. in accordance with the Data Protection and Privacy Policy of www.arukereso.hu. Naspers OCS Hungary KFT is the data controller of the data transmitted in this circle.

Your rights during data processing

During the period of data processing, you are entitled to the following rights under the provisions of the Regulation:

the right to withdraw consent

access to personal data and information related to data management

the right to rectification

restriction of data management,

the right to delete

right to protest

the right to portability.

If you wish to exercise your rights, this will involve your identification, and the Data Controller will need to communicate with you. Therefore, you will be required to provide personal information for identification purposes (but identification may only be based on data that is otherwise handled by you in the Data Controller), and your data management complaint will be made available in the Controller's email account within the timeframe specified in these complaints. If you were a customer and would like to identify yourself for complaints or warranty purposes, please also provide your order ID for identification. By using this we can identify you as a customer.

Complaints about data management must be answered within 30 days at the latest by Data Controller.

Right of withdrawal of consent

You have the right to withdraw your consent to data processing at any time, in which case the data you provide will be deleted from our systems. However, please note that for orders that have not yet been fulfilled, cancellation may result in us being unable to deliver to you. In addition, once your purchase has been completed, we will not be able to delete billing information from our systems in accordance with your accounting requirements, and if you owe it to us, we may process your information based on a legitimate interest in collecting your claim if your consent is withdrawn.

Access to personal data

You have the right to receive feedback from the Data Controller as to whether your personal data is being processed and, if data processing is in progress, to:

have access to the personal data processed and

please inform the Data Controller of the following information:

the purposes of data management;

the categories of personal data processed about you;

information on the recipients or categories of recipients to whom the Personal Data have been or will be disclosed by the Data Controller;

the intended period for which the personal data will be stored or, if this is not possible, the criteria for determining this period;

your right to request from the Data Controller the rectification, erasure or limitation of your processing of personal data concerning you and to object to the processing of such personal data in the case of data processing based on a legitimate interest;

the right to lodge a complaint to the supervisory authority;

if the data were not collected from you, all available information on their source;

the fact of automated decision-making (if applicable), including profiling, and at least in these cases, understandable logic and the

significance and expected consequences of such data management for you.

The purpose of exercising the right may be to establish and verify the lawfulness of data processing, and therefore, in the event of multiple requests for information, the Data Controller may charge a reasonable fee in exchange for providing the information.

Access to your personal data is ensured by the Data Controller by emailing you with your managed personal data and information once you have been identified. If you have a registration, we will grant you access so that you can view and verify personal information about you when you log in to your user account.

Please indicate in your application whether you are requesting access to personal data or requesting information on data management.

#### Right to rectification

You have the right, upon request, to rectify any inaccurate personal information concerning you at the request of the Data Controller.

#### Right to Restrict Data Management

You are entitled to request that the Data Controller restrict your data management if any of the following is true:

You dispute the accuracy of your personal data, in which case the limitation applies to the period of time that allows the Data Controller to verify the accuracy of your personal information;

the data processing is unlawful, but you are against the deletion of the data for any reason (for example, because the data are important to you because of a legal claim) and therefore do not request the deletion of the data but instead request a restriction on their use;

the Data Controller no longer needs personal data for the purposes of the marked data processing, but you request it for the purpose of submitting, asserting or defending legal claims; or

You have opposed the data processing, but it may also be in the legitimate interest of the Data Controller to justify the data processing, in which case it is necessary to restrict the data processing until it is determined whether the Data Controller's legitimate reasons take precedence over your legitimate reasons.

Where personal data processing is subject to restrictions, such personal data may be processed, except for storage, only with the consent of the data subject, or for the purpose of claiming, asserting or defending legal claims or other natural or legal persons or important public or Union interest.

The Data Controller will inform you in advance (at least 3 working days prior to the lifting of the restriction).

#### The right to delete - the right to forget

You are entitled to have your personal data deleted by you without undue delay if any of the following applies:

the personal data are no longer needed for the purpose for which they were collected or otherwise processed by the Data Controller;

You withdraw your consent and there is no other legal basis for data processing;

You object to data processing based on a legitimate interest and there is no overriding legitimate reason (ie a legitimate interest) to control the data,

the personal data was unlawfully processed by the Data Controller and ascertained from the complaint,

personal data must be deleted in order to comply with a legal obligation under Union or Member State law applicable to the Data Controller.

If the Data Controller has, for any lawful reason, disclosed Personal Data processed about you and is required to delete it for any of the above reasons, it shall take reasonable steps, including technical measures, to inform the Data, other data controllers that you have requested that links to, or duplicate or duplicate, such personal data be deleted.

Deletion shall not apply where processing is necessary:

for the exercise of the right to freedom of expression and information;

to fulfill an obligation under EU or Member State law applicable to the controller for the processing of personal data (in this case, billing data management as the retention of the account is required by law) or in the public interest or in the exercise of public authority;

to assert, enforce or defend legal claims (eg: if the Data Controller has a claim against you and has not yet fulfilled it, or a consumer or data processing complaint is pending).

#### Right to protest

You have the right to object at any time to the processing of your personal data for legitimate reasons related to your situation. In this case, the Data Controller may not further process the Personal Data unless it proves that the processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the filing, enforcement or defense of legal claims.

If your personal data is being processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for this purpose, including profiling, if it is related to direct marketing. If you object to the processing of your personal data for the purpose of direct marketing, your personal data may no longer be processed for this purpose.

#### Right to portability

If the data processing is done in an automated manner, or if the data processing is based on your voluntary consent, you have the right to request the Data Controller to receive the data you provide to the Data Controller in xml, JSON or csv format. if technically feasible, you may request the Data Controller to transfer the data in this form to another Data Controller.

**Automated Decision Making** You have the right not to be subject to any decision based solely on automated data management (including profiling) that would have legal effect or would have a significant effect on you. In such cases, the Data Controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including at least the right of the data subject to request human intervention, to express his / her views and to object to the decision.

The foregoing shall not apply where the decision:

Necessary for the conclusion or performance of a contract between you and the controller;

it is made possible by Union or national law applicable to the controller, which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or

is based on your explicit consent.

#### Signing in to the Privacy Register

Infotv. of the Act, the Data Controller had to report certain data processing activities to the Data Protection Register. This reporting obligation expired on May 25, 2018.

NAIH number registered before May 25, 2018:

Privacy Policy Number: NAIH-103533/2016.

#### Data security measures

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, or from access due to changes in the technology used.

Data Controller will do everything within its organizational and technical capabilities to ensure that its data processors also take appropriate data security measures when handling your personal data.

#### Remedies

If you believe that the Data Controller has violated a provision of the Data Processing Act or has not complied with your request, you may initiate an investigation by the National Data Protection and Freedom of Information Authority to remove suspected unlawful

data processing (mailing address: 1530 Budapest, PO Box 5, e- mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

In addition, please be advised that in the event of a violation of data processing laws or of a request by the Data Controller, you may institute civil proceedings against the Controller in court.

#### Modifying the Privacy Notice

The Data Controller reserves the right to modify this Privacy Policy in a manner that does not affect the purpose and legal basis of the data management. By using this website after the change comes into effect, you accept the modified privacy notice.

If the Data Controller intends to further process the collected data for purposes other than the purpose for which they were collected, it will inform you of the purpose of the data processing and the following information:

the length of time for which the personal data will be stored or, where this is not possible, the criteria for determining the duration;  
your right to request from the Data Controller access to, rectification, erasure or restriction of your personal data and to object to the processing of your personal data in the case of legitimate interest processing, rights;

in the case of consent-based data processing, that you may withdraw your consent at any time,

the right to lodge a complaint to the supervisory authority;

whether the provision of personal data is based on a legal or contractual obligation or a prerequisite for entering into a contract and whether you are required to provide personal data and the potential consequences of failure to disclose it;

the fact of automated decision-making (if applicable), including profiling, and at least in these cases, understandable logic and the significance and expected consequences of such data management for you.

Data management can only start after this, if the legal basis for the data management is consent, in addition to your information, you must consent to the data management.

This document contains all relevant data management information relating to the operation of the webshop in accordance with the General Data Protection Regulation of the European Union 2016/679 (hereinafter: "Regulation. GDPR") and the 2011 CXII. TV. (hereinafter referred to as "Info").

#### Postal and postal delivery

Please note that Magyar Potsa Zrt. Identifies the recipient in accordance with the prevailing data management information, and may, where appropriate, require your personal information to be provided upon delivery by post or postal delivery.