

# Privacy Policy

## Privacy Policy

Last updated: 11. 06. 2024

### Data Controller

Name: Weisson Kft.

Registered seat: 2241 Süllysáp, Tápió u. 3.

Mailing address, complaint management: 2241 Süllysáp, Tápió u. 3.

E-mail: [info@sportlampa.com](mailto:info@sportlampa.com)

Phone number: +36204603647

Website: <https://sportlampa.com>

### Hosting service provider

Name: UNAS Online Kft.

Mailing address: 9400 Sopron, Kőszegi út 14.

E-mail: [unas@unas.hu](mailto:unas@unas.hu)

## Description of the data processing activities carried out in the course of the operation of the webshop

This document contains all relevant data processing information regarding the operation of the webshop in accordance with General Data Protection Regulation (2016/679) of the European Union (hereinafter: Regulation or GDPR) and Act CXII of 2011 (hereinafter: Privacy Act).

### Information on the use of cookies

#### What is a cookie?

Upon visiting the website, the Data Controller uses cookies. A cookie is an information package consisting of letters and numbers sent to your browser by our website with the purpose of saving certain settings, facilitate the use of our website and help us collect relevant, statistical information of our visitors. Some cookies do not contain personal information and are not suitable for identifying individual users, but some cookies contain a unique identifier, that is, a secret number sequence generated randomly, which will be stored by your device and therefore will ensure your identification. The operational duration of each cookie is included in the relevant description.

#### Legal background and legal grounds of cookies:

The legal basis of processing is your consent pursuant to Article 6(1)(a) of the Regulation.

#### Main characteristics of the cookies used by the website:

##### Strictly necessary cookies:

If you do not accept the use of cookies, certain functions will not be available to you.

- **Cookies strictly necessary for operation:** These cookies are essential for the use of the website and enable the use of the basic functions of the site. In the lack of these cookies several functions of the website will not be available to you. The lifetime of these cookies is limited exclusively to the duration of the session.
- **Session cookies:** These cookies store the location of the user, the language of the browser, and the currency of the payment. Their lifetime lasts until the browser is closed or 2 hours at maximum.
- **Recommended product cookies:** It records the list of products intended to be recommended, at the "Recommend to a friend" function. Their lifetime is 60 days.
- **Mobile version, design cookies:** It detects the device used by the visitor and switches to full view on mobile. Their lifetime is 365 days.
- **Cookie acceptance cookies:** Upon arrival to the site, you accept the statement on the storage of cookies in the appropriate window. Their lifetime is 365 days.
- **Exit #2 cookies:** Logs the visitor out after 90 days according to the #2 option. Their lifetime is 90 days.
- **Backend identifier cookies:** Identifier of the backend server that serves the site. Their lifetime lasts until the browser is closed. `employee_login_last_email` It stores the email address at login, until the browser is closed.
- **Ealrm, ealem, ealpw:** Ensures permanent login. Their lifetime is 180 days.
- **come\_from:** Performs login redirection. Their lifetime is 10 minutes.
- **currency:** Stores the buyer's currency. Their lifetime is 30 days.
- **Barion Pixel cookies:** In the course of applying the Barion payment solution, Barion Payment Zrt. uses cookies to prevent fraud (`ba_vid`, `ba_vid.xxx`, and `ba_sid` cookies), which cookies process also personal data (profile). In the case of payment by Barion, the Seller can only ensure the payment with these cookies, it is unable to turn them off. The purpose of `ba_vid` cookies based on Barion's Cookie notice: it aims to detect credit card fraud based on the digital fingerprint of the device used by the Buyer and browsing habits. The use of the cookies is necessary to detect fraudsters. A cookie ensures that we know that data from your browsing habits come from a user. The purpose of `ba_vid.xxx` cookies based on Barion's Cookie notice: it aims to detect credit card fraud based on the digital fingerprint of the device used by the Buyer and browsing habits. The cookie ensures that Barion Zrt. can track your browsing habits between two sessions on the given website. This information is collected by these cookies: `ba_vid`, user-related ID, which is a hash compiled from the browser properties, based on the timestamp of your first, current and last visit to the website, the current session ID, permission for third-party cookies. The purpose of `ba_sid` cookies based on Barion's Cookie notice: it aims to detect credit card fraud based on the digital fingerprint of the device used by the Buyer and browsing habits. The cookie ensures that Barion Zrt. can identify the Buyer's session across websites. The storage period of `ba_vid` and `ba_vid.xxx` cookies is 1.5 years from the last update, storage period of `ba_sid` cookie is 30 minutes. Data are stored by Barion Zrt. Barion's cookie notice is accessible here:

<https://www.barion.com/en/cookie-notice/>

##### Statistic cookies:

- **Google Analytics cookies:** Google Analytics is Google's analytical tool that enables owners of websites and applications to get a more accurate picture of their visitors' activities. The service may use cookies to collect information and make reports of statistical data on the use of the website without individually identifying visitors for Google. Google Analytics primarily uses `__ga` cookies. In addition to reporting statistical data regarding the use of the website, Google Analytics, along with the above-

described ad cookies, can also be used to display more relevant ads in Google products (e.g., in Google Search) and across the web.

- **Cookies for improving user experience:** These cookies collect information of the way the user uses the website, for example which pages does the user visit most frequently or what error messages do they receive from the website. These cookies do not collect information identifying the visitor, that is, they work with completely general, anonymous information. They use the data extracted from such information to improve the performance of the website. The lifetime of these cookies is limited exclusively to the duration of the session.
- **Referrer cookies:** They record the external websites from which the visitor arrived to the site. Their lifetime lasts until the browser is closed.
- **Last viewed product cookies:** It records the product last viewed by the visitor. Their lifetime is 60 days.
- **Last viewed category cookies:** It records the category last viewed. Their lifetime is 60 days.
- **Cart cookies:** Records the products added to the cart. Their lifetime is 365 days.
- **Intelligent offer cookies:** Records the conditions for displaying intelligent offers (e.g., whether the visitor has already been to the site, whether they have an order). Their lifetime is 30 days.

### **Marketing cookies:**

- **Google Adwords cookies:** When someone visits our website, the cookie identifier of the visitor will be added to the remarketing list. Google uses cookies – e.g., NID and SID cookies – in Google products, such as to personalize the ads displayed in Google search. Google uses these cookies for example to remember your earlier searches, interactions with the ads of certain advertisers or search results, or visits to the advertisers' websites. AdWords conversion tracking uses cookies. To track sales and other conversions resulting from advertising, cookies are saved on the user's computer when the user clicks on the ad. Some common methods to use cookies are: to select ads based on what is relevant for the given user, to improve reports on campaign performance, and to avoid displaying ads that the user has already seen.
- **Remarketing cookies:** These cookies may appear to previous visitors or users when they browse other websites in the Google Display Network or search for terms related to its products or services.
- **predictionio:** User identifying cookie for recommending personalized ads. Their lifetime is 3 months.
- **Facebook pixel (Facebook cookies):** Facebook pixel is a code which enables a report to be prepared on the website on conversions, target audiences to be compiled and the owner of the site to receive detailed analysis about the visitors' use of the website. Facebook pixel enables personalized ads to be displayed for the visitors of the site on the platform of Facebook. You can read Facebook's Privacy Policy here: <https://www.facebook.com/privacy/explanation>

You can find further information about deleting cookies at 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/hu/kb/weboldalal-altal-elhelyezett-sutik-torlese-szamito>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Chrome: <https://support.google.com/chrome/answer/95647>
- Edge: <https://support.microsoft.com/hu-hu/help/4027947/microsoft-edge-delete-cookies>

### **Data processed for the purpose of concluding and performing the contract**

In order to conclude and performing the contract, several cases of data processing may occur. We hereby inform you that data processing related to complaint management and administration related to guarantee rights will only be carried if you exercise one of the said rights. If you do not purchase via the webshop but arrive only as a visitor, then the provisions on data processing for marketing purposes may apply to you if you give consent to us for marketing purposes. Data processing activities for the purpose of concluding and performing the contract in detail are:

#### **Contact**

If, for example, you contact us via email, contact form or by phone for inquiry on a product. Prior contact is not necessary, you can order from the webshop at any time in the lack of it.

#### **Data processed**

The data provided by you upon contacting us.

#### **Period of the data processing**

We process the data for 5 years in accordance with the civil-law limitation period.

#### **Legal basis for the data processing**

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

#### **Registration on the website**

By storing the data provided upon registration, the Data Controller can provide more convenient service (e.g., the data subject will not have to provide their data each time they shop on the site). Registration is not a requirement for contracting

#### **Data processed**

During the data processing, the Data Controller processes your name, address, phone number, email address, the properties of the products purchased and the date of the purchase.

#### **Period of the data processing**

Until the withdrawal of your consent.

#### **Legal basis for the data processing**

Your voluntary consent given to the Data Controller by the registration. [Data processing pursuant to Article 6(1)(a) of the Regulation]

#### **Processing the order**

Data processing activities in the course of order management required for the purpose of performing the contract.

#### **Data processed**

During the data processing, the Data Controller processes your name, address, email address, the properties of the products purchased, the order number and the date of the purchase. If you place an order in the webshop, the data processing and the provision of the data is inevitable for the performance of the contract.

#### **Period of the data processing**

We process the data for 5 years in accordance with the civil-law limitation period.

### **Legal basis for the data processing**

The performance of the contract. [Data processing pursuant to Article 6(1)(b) of the Regulation]

### **Issuing the invoice**

The data processing is carried out for the purpose of issuing an invoice in compliance with the law and fulfilling the obligation of retaining the accounting document. Pursuant to paragraphs (1)-(2) of section 169 of the Accounting Act, economic organisations must retain accounting documents directly and indirectly supporting the accounting records.

### **Data processed**

Name, address, e-mail address, phone number.

### **Period of the data processing**

Pursuant to paragraph (2) of section 169 of the Accounting Act, the issued invoices must be retained for 8 years of the issuing.

### **Legal basis for the data processing**

Pursuant to paragraph (1) of section 159 of Act CXXVII of 2007 on value added tax, issuing an invoice is mandatory and, pursuant to paragraph (2) of section 169 of the Accounting Act, the issued invoices must be retained for 8 years. [Data processing pursuant to Article 6(1)(c) of the Regulation].

### **Data processing related to product delivery**

The data processing is carried out for the purpose of delivering the ordered product.

### **Data processed**

Name, address, e-mail address, phone number.

### **Period of the data processing**

The data processing is carried out for the purpose of delivering the ordered product.

### **Legal basis for the data processing**

The performance of the contract. [Data processing pursuant to Article 6(1)(b) of the Regulation]

### **Recipients and data processors for delivery of goods**

Name of recipient: (Packeta) Zásilkovna s.r.o.

Registered seat of recipient: t Českomoravská 2408/1a, Libeň, 190 00 Prague 9

E-mail address of recipient: [privacy@zasilkovna.cz](mailto:privacy@zasilkovna.cz)

Website of recipient: <https://www.packeta.com/global>

### **Management of warranty and guarantee claims**

As regards the warranty and guarantee rights, we must proceed pursuant to Decree 19/2014. (IV. 29.) of the Minister of National Economy, which determines the manner of the management of such claims.

### **Data processed**

As regards the warranty and guarantee rights, we must proceed pursuant to Decree 19/2014. (IV. 29.) of the Minister of National Economy.

Pursuant to the Decree, we must take record of the warranty or guarantee claim we were notified of, in which we record:

1. your name, address, and statement on that you consent to the processing of your data indicated in the record pursuant to the Decree,
2. name and purchase price of the tangible object sold under the contract concluded between us,
3. date of the performance of the contract,
4. date of the reporting of the defect,
5. description of the defect,
6. the right you wish to assert based on your warranty or guarantee right, and
7. the manner of handling the warranty or guarantee claim, or the justification of the rejection of the right intended to be asserted on the basis of the claim.

If we take over the purchased Product from you, we must issue an acknowledgement of receipt, which must include the following:

1. your name and address,
2. data required for the identification of the object,
3. date of the receipt of the object, and
4. the date when you can accept the repaired object.

### **Period of the data processing**

The business is obliged to retain the record taken of the consumer's submitted warranty or guarantee claim for three years of taking the record, and to present it upon a request of the controlling authority in that regard.

### **Legal basis for the data processing**

The legal basis for the data processing is compliance with the legal obligations prescribed by Decree 19/2014 (IV. 29.) of the Minister for National Economy [paragraph (1) section 4. and paragraph (1) section 6] [Data processing pursuant to Article 6(1)(c) of the Regulation].

### **Management of other consumer protection complaints**

The data processing will be carried out for the purpose the management of complaints concerning consumer protection. If you turn to us with a complaint, the data processing and the provision of the data will be inevitable.

### **Data processed**

Buyer's name, phone number, email address, content of complaint.

### **Period of the data processing**

Consumer complaints are kept for 3 years based on the Consumer Protection Act.

### **Legal basis for the data processing**

You can voluntarily decide whether you intend to submit a complaint to us, but if you do so, we are obliged to retain your complaint for a period of 3 years pursuant to paragraph (7) of section 17/A of Act CLV of 1997 on consumer protection [Data processing pursuant to Article 6(1)(c) of the Regulation].

### **Data processed in relation to the verifiability of the consent**

Upon registration, placing an order, or subscription to newsletter, the IT system stores the IT data related to the consent for evidence purposes.

#### **Data processed**

The date of the consent and the data subject's IP address.

#### **Period of the data processing**

Due to compliance with legal provisions, the consent must be verifiable later, therefore, the data are stored for the limitation period following the termination of data processing.

#### **Legal basis for the data processing**

This obligation is prescribed by Article 7(1) of the Regulation [Data processing pursuant to Article 6(1)(c) of the Regulation]

### **Data processing with marketing purposes**

#### **Data processing related to sending newsletters**

Data processing is carried out for the purpose of sending newsletters.

#### **Data processed**

Name, address, e-mail address, phone number.

#### **Period of the data processing**

Until the withdrawal of the data subject's consent.

#### **Legal basis for the data processing**

Your voluntary consent given to the Data Controller by subscribing to the newsletter. [Data processing pursuant to Article 6(1)(a) of the Regulation]

#### **Data processing related to sending and displaying personalized ads**

The data processing is carried out for the purpose of sending ad content in accordance with the data subject's range of interest.

#### **Data processed**

Name, address, e-mail address, phone number.

#### **Period of the data processing**

Until the withdrawal of your consent.

#### **Legal basis for the data processing**

Your voluntary, separate consent given to the Data Controller upon data collection. [Data processing pursuant to Article 6(1)(a) of the Regulation]

#### **Remarketing**

Data processing is carried out as a remarketing activity, enabled by cookies.

#### **Data processed**

Data processed by the cookies defined in the cookie notice.

#### **Period of the data processing**

The period of data storage by the given cookie. Further information is available here:

General cookie information of Google:

<https://www.google.com/policies/technologies/types/>

Google Analytics information:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>

Facebook information:

[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 the data processing**

Your voluntary consent given to the Data Controller by using the website. [Data processing pursuant to Article 6(1)(a) of the Regulation]

#### **Sweepstakes**

The data processing is carried out in order to run the sweepstakes.

#### **Data processed**

Name, email address, phone number.

#### **Period of the data processing**

The data will be erased after the closure of the sweepstakes, with the exception of the data of the winners, which the Data Controller is obliged to retain for 8 years pursuant to the Accounting Act.

#### **Legal basis for the data processing**

Your voluntary consent given to the Data Controller by using the website. [Data processing pursuant to Article 6(1)(a) of the Regulation]

#### **\*Automated decision-making\***

The purpose of automated decision-making is the conclusion and performance of the contract between the Data Controller and the data subject, the result of the automated decision-making will be checked by the Data Controller's staff. The data subject is entitled

to request human intervention on the part of the Data Controller in relation to the automated decision-making, to express their position, and to submit an objection against the decision.

The Data Controller applies automated decision-making in the following cases:

Regular customer discount - applied logic: - consequences regarding the data subjects: Coupon code

- applied logic: - consequences regarding the data subjects: Weight-based delivery fee calculator

- applied logic: - consequences regarding the data subjects: Value-based delivery fee calculator

- applied logic: - consequences regarding the data subjects:

Additional data processing activities If the Data Controller intends to carry out any further data processing activities, it will provide prior information on the actual circumstances of the data processing (legal background and legal basis of the data processing, the scope of the processed data, the period of the data processing).

## Recipients of personal data

### Activities of data processors for storing personal data

**Name of the data processor:** UNAS Online Kft.

**E-mail of the data processor:** unas@unas.hu

**Registered seat of the data processor:** 9400 Sopron, Kőszegi út 14.

**Website of the data processor:** unas.hu

The Data Processor carries out personal data storage on the basis of a contract concluded with the Data Controller. The Data Processor is not entitled to access the personal data.

### Activities of data processors related to sending newsletters

**Name of the company operating the newsletter system:** The Rocket Science Group LLC.

**Registered seat of the company operating the newsletter system:** 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA

**E-mail address of the company operating the newsletter system:** privacy@mailchimp.com

**Website of the company operating the newsletter system:** mailchimp.com

The Data Processor participates in sending the newsletters under a contract concluded with the Data Controller. In the course of that participation, the Data Processor processes the data subject's name and address, to the extent necessary for sending newsletters.

### Activities of data processors related to invoicing

**Name of the data processor:** KBOSS.hu Kft.

**Registered seat of the data processor:** 1031 Budapest, Záhony utca 7.

**Website of the data processor:** <https://www.szamlazz.hu>

The Data Processor participates in recording accounting documents under a contract concluded in writing with the Data Controller. In the course of that participation, the Data Processor processes the data subject's name and address, to the extent necessary for accounting records, for the period in compliance with paragraph (2) of section 169 of the Accounting Act, and will erase them immediately thereafter.

### Data processing related to online payment

**Name of the data controller:** Barion Payment Zrt.

**Registered seat of the data controller:** 1117 Budapest, Infopark sétány 1. I. épület 5. emelet 5.

**Website of the data controller:** <https://www.barion.com/hu/>

**Name of the data controller:** Teya Solutions Ltd.

**Registered seat of the data controller:** Third Floor, 20 Old Bailey, London, EC4M 7AN, United Kingdom

**Website of the data controller:** <https://www.teya.com/>

The online payment service provider participates in implementing online payments under a contract concluded in writing with the Data Controller, for the purpose of which data transfer is carried out towards the online payment service provider in the course of the purchase process. In the course of that participation, the online payment service provider processes the data subject's invoicing name and address, as well as the number and date of order, under its own privacy policy. The purpose of data transfer: to provide the online payment service provider with the transaction data necessary for the payment operation initiated at the online payment service provider and related to the purchase.

**Legal basis:** performance of the contract concluded between you and the Data Controller pursuant to Article 6(1)(b) of the Regulation, which includes payment on the buyer's part, and for which, in the case of online payment, data transfer under this section is required.

## ACTIVITIES OF DATA PROCESORS RELATED TO WEBSHOP FULFILLMENT SERVICE

**Name of the data processor:** Whitefish Logisztika Kft.

**The data processor's registered office:** 2336 Dunavarsány, Csenkesz utca 4.

The purpose of the processing of personal data by the Data Processor: order management, Product packaging, handover of packages to the Service Provider carrying out delivery, management of returned products, issuing invoices on behalf of the Data Controller. In addition, the Data Processor enables the Data Controller to register the above data in the Webshippy System without a limitation in time.

### Categories of the processed data:

Customer data required for invoicing and delivery: name of the addressee (buyer), delivery address, billing address (if the invoice is issued by the Data Processor on behalf of the Data Controller), phone number, e-mail address, Purchase data: date, Purchased product price, Properties of the product, Delivery method and status, Payment method and status, Amount, Order ID, Delivery details and notes.

### Period of the processing of personal data

The Data Controller instructs the Data Processor to retain the processed data for 1 year after the fulfilment of the order in the Whitefish System. The Whitefish System enables the Data Controller to have the data registered even after the expiry of the 1-year retaining period as regards orders which are fulfilled via the Whitefish System. The Data Controller is able to erase the data from the registry at any time after the expiry of the 1-year retaining period, thus, the Whitefish System enables the Data Controller to meet the data processing deadlines determined by the Data Controller itself.

## **Your rights in the course of the data processing**

Within the period of data processing, you are entitled to the following rights pursuant to the provisions of the Regulation:

- right to withdraw consent
- access to personal data and information related to data processing
- right to rectification
- restriction of data processing,
- right to erasure
- right to object
- right to data portability.

If you wish to exercise your rights, it will involve your identification, and the Data Controller must necessarily communicate with you. Therefore, for the purpose of identification, it will be necessary to provide personal data (but only your data already processed by the Data Controller can serve as the basis of identification), and your complaints as regards data processing will be available in your email account within the period specified in this Privacy Notice regarding complaints. If you have been our customer and you wish to identify yourself for the purpose of complaint handling or guarantee management process, please enter your order ID as well for identification. That way we can identify you as our customer. The Data Controller will respond to complaints as regards data processing within 30 days at the latest.

### **Right to withdraw consent**

You have the right to withdraw your consent to data processing at any time, in which case the data provided will be erased from our system. However, please note that in the case of an order that has not yet been fulfilled, the withdrawal of consent may result in you not being able to complete the delivery of your order. In addition, if the purchase has already been completed, based on the accounting regulations, we cannot erase the date related to invoicing from our systems, and if there is any remainder amount unpaid by you to us, we can process your data even in the event of the withdrawal of your consent based on the legitimate interest in debt collection.

### **Access to personal data**

You have the right to obtain from the Data Controller confirmation as to whether your personal data are being processed, and where that is the case, you have the right to:

- a gain access to the processed personal data, and
- a receive information from the Data Controller on the following:
  - the purposes of data processing;
  - the categories of your personal data processed;
  - information on the recipients or categories of recipients to whom the personal data have been or will be disclosed;
  - the envisaged period of the processing of personal data or, if that is not possible, the criteria used to determine that period;
  - the existence of your right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing;
  - the right to lodge a complaint with a supervisory authority;
  - where the personal data are not collected from the data subject, any available information as to their source;
  - the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

The purpose of exercising these rights may be aimed at establishing and verifying the lawfulness of data processing, therefore, in case of multiple requests for information, the Data Controller may charge a fair fee in exchange for providing the information.

Access to personal data is ensured by the Data Controller by sending you the processed personal data and information by email after your identification. If you have registered, we provide access so that you can view and check your personal data by logging into your user account.

Please indicate in your request that you ask for access to personal data or information on data processing.

### **Right to rectification**

You have the right to obtain from the Data Controller without delay the rectification of inaccurate personal data concerning you.

### **Right to the restriction of data processing**

You have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling the Data Controller to verify the accuracy of the personal data, and if the accurate data can be immediately established, then no restriction will take place;
- the data processing is unlawful and you oppose the erasure of the personal data for any reason (for example because the data are necessary for the possible assertion of a claim) and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims, or if you have objected to the data processing but the legitimate interest of the Data Controller may also serve as grounds for it, the data processing must be restricted until it can be established whether the legitimate grounds of the Data Controller override the legitimate grounds referred to by you.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

You will be informed by the Data Controller before the restriction of processing is lifted (at least 3 business days before the restriction is lifted).

### **Right to erasure – right to be forgotten**

You have the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Data Controller;
- you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing based on legitimate interest and there are no overriding legitimate grounds (that is, legitimate interest) for the processing,
- the personal data have been unlawfully processed by the Data Controller where that was established on the basis of the complaint,
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject.

Where the Data Controller, based on any lawful ground, has made the personal data public and is obliged to erase the personal data due to any of the above grounds, the controller, taking account of available technology and the cost of implementation, shall take

reasonable steps, including technical measures, to inform other data controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The erasure shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- or compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject (data processing in the framework of invoicing is one of those cases, as the retaining of the invoice is prescribed by law), or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- for the establishment, exercise or defence of legal claims (e.g., if the Data Controller has any claims against you which has been not fulfilled yet, or there is undergoing complaint management process).

### **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests. In such case, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

### **Right to data portability**

If the data processing is carried out in an automated way or if the data management is based on your voluntary consent, you have the right to ask the Data Controller for the data you provided to the Data Controller, which the Data Controller will send in xml, JSON or csv format at your disposal, and, if this is technically feasible, you can request that the Data Controller forward the data in this form to another data controller.

### **Automated decision-making**

You have the right not to be subject to a decision which is based solely on automated processing (including profilin) and which produces legal effects concerning you or similarly significantly affects you. In these cases, the Data Controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and to contest the decision.

The above shall not apply if the decision:

- is necessary for the conclusion and performance of the contract between you and the Data Controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

### **Reporting to the Data Protection Registration System**

Pursuant to the Privacy Act, the Data Controller must report its certain data processing activities to the data protection registration system. This reporting obligation was terminated on 25 May 2018.

### **Data security measures**

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

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

### **Remedies**

If, in your opinion, the Data Controller has violated a legal provision relating to data processing or has not fulfilled any of your requests, then in order to terminate alleged unlawful data processing, you can initiate the investigative procedure of the Hungarian National Authority for Data Protection and Freedom of Information (mailing address: H-1363 Budapest, Pf. 9., e-mail: ugyfelszolgalat@naih.hu, phone numbers: +36 (30) 683-5969 +36 (30) 549-6838; +36 (1) 391 1400).

We would also like to inform you that in the event of a violation of the legal provisions on data processing, or if the Data Controller has not fulfilled any of your requests, you may file a civil lawsuit against the Data Controller in court.

### **Amendment of the Privacy Policy**

The Data Controller reserves the right to modify this data management information in a way that does not affect the purpose and legal basis of data processing. By using the website after the amendment enters into force, you accept the amended Privacy Notice.

If the Data Controller wishes to carry out further data processing in relation to the collected data for a purpose other than that of their collection, it will inform you, before commencing any further data processing, of the purpose of the data processing and the information on the following:

- the envisaged period of the processing of personal data or, if that is not possible, the criteria used to determine that period;
- the existence of your right to request from the Data Controller access to, rectification or erasure of personal data or restriction of processing of personal data concerning you, or to object to such processing in the case of data processing on the grounds of legitimate interest, or to request ensuring data portability in the case of data processing on the grounds of consent or contractual relationship;
- in the case of data processing on the grounds of consent, that you may withdraw your consent at any time,
- the right to lodge a complaint with a supervisory authority;
- whether the provision of personal data is based on legislation or a contractual obligation or is a prerequisite for concluding a contract, as well as whether you are obliged to provide personal data, and what possible consequences the failure to provide data may have;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

The data processing may only be commenced thereafter, and, in the case of data processing on the grounds of consent, your consent will also be required to the data processing in addition to the provision of the above information.