

## **Data Protection Notice**

Please carefully read the Data Protection Notice to understand how we handle your personal data and learn about your rights regarding data processing.

Pongrácz Gábor E.V. (head office: 2030 Érd, Borbála u. 10., tax number: 69348417-1-33, hereinafter: Data Controller), as the data controller, provides this notice in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter: the Regulation) about the data processing carried out on the website <https://www.asromahistory.com>.

## **Data Controller Information**

- Name of Data Controller: Pongrácz Gábor E.V.
- Head office: 2030 Érd, Borbála u. 10.
- Phone number: +36 30 4390420
- Email address: [info@asroma.hu](mailto:info@asroma.hu)
- Website: <https://www.asromahistory.com>

## **Purpose of Personal Data Processing**

We process your personal data on the <https://www.asromahistory.com> website for the purpose of processing your purchase.

## **Legal Basis for Personal Data Processing**

We process your personal data based on the following legal grounds:

- For the performance of contracts related to the digital books offered in the webshop (billing, shipping) [surname, first name, shipping address, phone number, email address, financial data related to the purchase, billing name and address] – Article 6(1)(b) of the Regulation, i.e., the processing is necessary for the performance of a contract with you.

## **Categories of Personal Data Processed and Retention Period**

Your personal data is processed for the following periods:

1. For data related to the performance of contracts for products available in the webshop – for 5 years after the completion of the contracts.  
The retention period for accounting records is 8 years.

If required by ongoing legal, court, or other procedures to demonstrate compliance with applicable legal obligations or for the assertion, enforcement, or defense of legal claims, data processing may be necessary beyond the above period.

## **Use of Cookies**

The website does not use cookies.

## **Recipients of Personal Data, Data Processors, Data Transfers**

Only our executives and the data processors listed below (only to the extent necessary for their activities) will have access to your personal data.

We use data processors for the following activities:

- **Pongrácz Gábor E.V.** (2030 Érd, Borbála u. 10.) – advertising agency [marketing] services, accounting and financial services, customer service, IT services, order fulfillment.
- **Google Ireland Limited** (Gordon House Barrow Street Dublin4. Ireland) – visitor statistics.

Among the data processors used by the Data Controller, third-country processors are:

- **SendGrid** (United States). The European Commission has issued an adequacy decision for the countries concerned, in accordance with Article 45 of the Regulation.

The Data Controller does not intend to transfer personal data to any other third-country recipients or international organizations.

## **Data Security**

The servers storing your personal data are protected by appropriate security systems and are placed in server rooms that are not accessible to unauthorized persons. Remote access to the servers is only possible through highly encrypted channels, and only individuals who require access for server operation purposes are authorized to do so. The passwords provided by users during registration are not stored in text format but are stored in the form of their "hash fingerprint."

## **Rights of the Data Subject**

### **1. Right of Access**

You are entitled to receive feedback from us regarding whether your personal data is being processed and, if so, to access your personal data and related information as specified in Article 15 of the Regulation.

### **2. Right to Rectification**

You are entitled to request the rectification of inaccurate personal data concerning you without undue delay. Considering the purpose of processing, you may also request the completion of incomplete personal data.

### **3. Right to Erasure**

You are entitled to request the erasure of your personal data without undue delay if the conditions outlined in Article 17 of the Regulation are met, such as if the personal data is no longer necessary for the purposes for which it was collected or otherwise processed, or if you withdraw your consent and there is no other legal basis for processing. However, this right does not apply if the processing is necessary for the establishment, exercise, or defense of legal claims.

### **4. Right to Restriction of Processing**

You are entitled to request the restriction of processing if the conditions outlined in Article 18 of the Regulation are met, such as if you contest the accuracy of the personal data, or if the processing is unlawful and you oppose the erasure of the data, or if you object to the processing.

5. **Right to Data Portability**

You are entitled to receive your personal data that you have provided to us in a structured, commonly used, and machine-readable format, and you are entitled to transmit this data to another data controller without hindrance, provided that the processing is based on your consent and is carried out in an automated manner.

6. **Right to Withdraw Consent**

You are entitled to withdraw your consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

7. **Complaint, Judicial Remedy**

In Hungary, the supervisory authority for data protection is the **National Authority for Data Protection and Freedom of Information** (1125 Budapest, Szilágyi Erzsébet Fásor 22/C., [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). You have the right to lodge a complaint with the supervisory authority if you believe that the processing of your personal data infringes the Regulation. You are also entitled to judicial remedy against a decision of the supervisory authority.

In case of disputes regarding data protection, courts have jurisdiction. In principle, the **Budapest-Capital Regional Court** has jurisdiction in cases initiated against us.

**Source of Personal Data**

You have provided your personal data to us during your use of the site.