

Privacy Policy

About the data processing of the www.quietcup.hu webshop operated by Silózó Kft. Valid from: March 01, 2025.

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When operating the www.quietcup.hu webshop and its related online customer service operated by Silózó Kft., personal data is processed during the support provided to customers, about which we provide the following information based on Article 13 (1)-(2) of the GDPR.

Silózó Kft. (hereinafter: the Data Controller)

reserves the right to modify this information at any time. If there is a change in the data processing of the Data Controller under any circumstances, this information will be changed within 30 days. This information will be posted on the website operated by the Data Controller and in the customer service office. The modifications will be included in this information in a unified structure, about which the Data Controller will place a notice on its website and customer service.

If the Data Controller is unable to verify the personal data provided to it, the person providing it is responsible for the authenticity and accuracy of the personal data provided. The Data Controller draws the attention of the data subjects to help the Data Controller keep the personal data they have provided up-to-date and to notify

any changes to the data.

1.1. Information about the Data Controller

Name: Silózó Kft. Headquarters: 5000 Szolnok, Kossuth Tér 7. 1. em. 6.

Location: 5000 Szolnok, Kossuth Tér 7. 1. em. 6.

Representative: Dusan Cziklin

Accounting bank name: MBH Bank

Account number: 10300002-10385366-49020010

Tax number: 13278809216

Telephone number: 0630/5764264 or 0630/3358951

Email address: silent.quietcup@gmail.com

Website: www.quietcup.hu

Webshop: www.quietcup.hu

A brief summary of your data protection rights

How can you request information regarding the processing of your personal data? At your request, the Data Controller will provide information about your data that is processed by the Data Controller or processed by the Data Controller (or the data processor commissioned by the Data Controller). This includes information about the source, purpose, legal basis, duration of the data processing, the name, address and activities of the data processor related to the data processing, the circumstances, effects and measures taken to address the data protection incident, and - in the case of the transfer of the personal data of the data subject - the legal basis and recipient of the data transfer. The Data Controller will fulfill its information-related tasks within 30 days of receiving your request.

The Data Controller will consider a request for information sent by letter to be authentic if the user can be clearly identified based on the request sent. The Data Controller shall only consider a request for information sent by e-mail as authentic if it is sent from the user's e-mail address, however, this does not preclude the Data Controller from identifying the user in another way before providing the information. In order to fulfill the request, the Data Controller shall be obliged to ensure that the person entitled to do so wishes to assert his or her rights as a data subject. For this purpose, in justified cases, it may also be necessary for the the data subject must appear in person at the registered office of the Data Controller for the purpose of personal identification.

When can you request the rectification of your data?

If you or the Data Controller notice that the personal data processed by you are inaccurate, incorrect or otherwise inadequate, either at your request or as a result of the Data Controller's own action, the Data Controller shall rectify the incomplete or incorrect data. When do you have the right to have your personal data deleted? You may request the permanent and irretrievable deletion of your personal data at any time if the Data Controller processes your data based on your consent. In the case of data processing in the legitimate interests of the Data Controller or you, as well as in order to fulfill mandatory legal storage and retention obligations, the Data Controller cannot delete your data. The Data Controller will delete the personal data at the same time as the purpose of the data processing ceases. The Data Controller will also delete the data if it is proven that the processing of the data is unlawful for some reason, or even if its deletion is legally ordered by an authority or court. When should we block your personal data?

You may at any time request that the processing of some or all of the data you have provided to the Data Controller be restricted. The Data Controller will not delete the data in the event of your request for data deletion, but will block the data if the data deletion would harm your legitimate interests. The Data Controller will only process the blocked data as long as the purpose for which the data was blocked exists, after which the blocked data will also be deleted.

How can you withdraw your consent to the processing of your personal data? You have the right to withdraw your consent to the processing of your personal data at any time. The Data Controller will consider the withdrawal of consent sent by letter to be authentic if the user can be clearly identified based on the request sent. The Data Controller considers the withdrawal of consent sent by e-mail to be authentic only if it is sent from the user's e-mail address, but this does not exclude the Data Controller from identifying the user in another way before providing the information. Where can you turn with your complaint?

You have the right to submit your complaint regarding data processing to the National Data Protection and Freedom of Information Authority.

National Data Protection and Freedom of Information Authority

1055 Budapest Falk Miksa u. 9-11.

Mailing address: 1363 Budapest, PO Box 9. Telephone:

+36-1-391-1400 Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

How can you go to court if we have violated your rights?

You have the right to go to court in connection with data processing. The Court of Justice is competent for the lawsuit, and you may also submit your claim against the Data Controller to the court of your place of residence. The court will consider your application in an extraordinary procedure. How do we obtain your personal data?

You provide your personal data to the Data Controller. If the data did not come from you, the Data Controller will, if it detects this or if you indicate this, upon request, immediately delete the document unlawfully submitted to the Data Controller, along with its entire data content.

What do we do to ensure that your personal data is handled securely? The Data Controller strives to guarantee the security of the data in every way that can be expected of it and with the technical means at its disposal, and takes all necessary steps to this end, including strictly restricting access to the data. What basic principles do we consider mandatory during our personal data processing? Personal data:

a) must be processed lawfully and fairly, and in a manner that is transparent to the data subject ("lawfulness, fairness and transparency");

b) must be collected only for specified, explicit and legitimate purposes and must not be processed in a manner that is incompatible with these purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes shall not be considered incompatible with the original purpose in accordance with Article 89(1) of the GDPR ("purpose limitation");

c) adequate and relevant in relation to the purposes of the processing and limited to what is necessary ("data economy");

d) accurate and, where necessary, kept up to date; every reasonable step shall be taken to ensure that personal data which are inaccurate, having regard to the purposes of the processing, are erased or rectified without delay ("accuracy"); e)

stored in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for a longer period only if the personal data are processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR, subject to the implementation of appropriate technical and organizational measures to protect the rights and freedoms of data subjects ('storage limitation');

f) processing must be carried out in such a way that appropriate technical or

organizational measures are applied to ensure the appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage ('integrity and confidentiality'). g) The Data Controller is responsible for compliance with the above and must be able to demonstrate such compliance ('accountability').

2. Detailed data processing information

2.1. Introduction to data processing

Exercise of rights related to personal data

Purpose of data processing: To consider and fulfill requests received by the Data Controller regarding the processing of data of natural persons – requesting information about the existing processing of their personal data, requesting access to their personal data, correcting them, erasure or restricting their processing, and objecting to the processing of personal data, as well as the data subject's right to data portability, and submitting a complaint regarding the processing of their personal data.

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Data subject: the Data Controller's clients who exercise their rights related to personal data against the Data Controller **Data scope: the data subject's first and last name, contact details, and other data necessary for the identification of the data subject, as well as data provided by the data subject in connection with the case or request, including possibly special categories of personal data.**

	e-mail address
	postal address
Categories of personal data	
surname and first name	

other data necessary for the identification of the data subject, as well as data provided by the data subject in connection with the case or request, including possibly special categories of personal data	necessary for the fulfillment of the data subject's request
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Legal basis for data processing: Pursuant to Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), the fulfilment of a legal obligation applicable to the Data Controller. Source of personal data and scope of data processed, if not provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject. Recipients of personal data and categories of recipients
The Data Controller may forward the requests of data subjects to the NAIH in the event of an official request, notifying the data subject in writing in advance. Storage period of personal data: 5 years from the date of filing.
Method of data storage: in the Data Controller's physically protected office

premises, in its archives on paper and in its records management system electronically, accessible by persons with appropriate authorization according to internal regulations.

With our data processing related to the exercise of data subject rights, you have the opportunity to

- information, - access,
- correction, - restriction,
- and exercise your right to legal remedy regarding your personal data. You can find a presentation of the content of the data subject rights in point 3 of the information.

Chatbox.

Purpose of data processing: In order to support its communication with customers, the Data Controller operates a Messenger chatbot service available on the Data Controller's social media page. During the use of the service, the chat bot answers the questions asked by interested parties based on the keywords found in them.

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Data subject: Persons using the Messenger service on the Data Controller's social media page. **Data scope:** personal data that cannot be categorized in advance and that are individually provided by the user.

Categories of personal	data Purpose of data processing
surname and first name	identification of the data subject
other data necessary for the identification of the data subject, as well as data provided by the data subject in connection with the case or request, including possibly special categories of personal data	necessary for the fulfillment of the data subject's request

The Data Controller expressly draws the attention of the user to be careful when providing his/her personal data when using the chatbot and not to provide any information to the Data Controller other than that recorded in the first two points of the previous paragraph.

Legal basis for data processing: the users' voluntary, specific and informed consent (GDPR Article 6 (1) a)).

Source of personal data and scope of data processed, if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that is not collected from the data subject. Recipients and categories of recipients of personal data

Name: Meta Platforms Ireland Ltd., the Data Controller's hosting service provider, and as an independent Data Controller Headquarters: 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland Privacy Policy:

<https://www.facebook.com/privacy/explanation>

Period of storage of personal data

If no product or service is ordered, the user's unique identification number will be retained for statistical purposes and for the purpose of identifying the User for one year from the first activity (if the User does not use the chatbot service again within one year of the first activity) or

for five years (if the User uses the chatbot service again within one year of the first activity)

If the user provides personal data in connection with the purchase or use of the service in connection with the administration, the Data Controller will process it in accordance with the rules related to the purchase and use of the services, or may process it according to the types of transactions or transactions as set out in this Policy.

We process the data until the consent is withdrawn, but for a maximum of 5 years, or until the purpose of the data processing exists, and then delete it immediately.

Data storage method: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by those with appropriate authorization according to internal regulations.

You have the opportunity to

- information,

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- access,

- correction,

- to delete,

- to restrict,

- to portability of data processed in an automated manner, - and to exercise the right of legal remedy.

A private customer may withdraw their consent at any time.

You can find a presentation of the content of the rights of the data subject in point 3 of the information.

Google Adwords conversion tracking

Purpose of data processing: The Data Controller uses the Google AdWords online advertising program, within which it uses Google's conversion tracking service. When a visitor to the website accesses the website through a Google advertisement, a cookie necessary for conversion tracking is placed on their computer. These cookies have a limited validity and do not contain personal data by which the visitor can be identified.

Data subject: The user logging into the website.

Data scope:

Google AdSense and AdMob place cookies and use web beacons for the purpose of collecting information.

The information stored by the cookie (including the User's IP address) is transferred to Google Inc. stored on servers in the United States. Google Inc. may transfer the collected information to third parties if required to do so by law or if such third parties process the information on behalf of Google Inc.

Google Inc. places visitor tracking cookies on users' devices within the framework of Google AdSense and Google Ads remarketing, which monitor the online behavior of visitors and on the basis of which Google Inc. makes advertising based on user behavior and interests available to them on other websites.

The tracking cookie allows Google Inc. to identify the website visitor on other websites.

Google Inc.'s "Privacy Policy"

is available at <http://www.google.hu/intl/hu/policies/privacy/>.

On the Google Inc. website, Google Inc. You can find further useful information about its data-related activities and about disabling cookies and personalizing ads at:

<https://adssettings.google.com/anonymous>

Other information is available:

Google AdSense <https://policies.google.com/privacy?hl=hu>

Google Ads <https://www.google.com/intl/en/policies/privacy>

Legal basis for data processing: Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), based on the legitimate interest of the Data Controller.

Description of the legitimate interest:

The purpose of Google Adwords is to draw the attention of our customers to our promotional offers with the help of advertising materials on external websites. From the data of our advertising campaigns, we can determine how successful they are.

We do not collect or process

no personal data about you during advertising, we only receive statistical data, we cannot identify users.

The client has the right to view the full text of the balancing test, which request can be submitted in a letter to the email address in point 1.1.

Source of personal data and the scope of processed data, if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject.

Source of personal data and the scope of processed data, if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject. Storage period of personal data: 1 year

Method of data storage: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

Recipients of personal data

The Data Controller's hosting provider and, as an independent Data Controller, Google Inc., 1600 Amphitheatre Parkway, Mountainview, California 94043, USA: <https://www.google.com/policies/privacy/>

You have the right to

- information, - access,
- rectification,

- objection,

- restriction,

- and legal remedy regarding our data processing related to the use of Google Adwords.

The data subject may object to the data processing, provided that there are no compelling reasons that require the further processing of the personal data (for example, the submission, enforcement or defense of the Data Controller's legal claims), the data processing must be terminated and the data must be deleted.

You can find a presentation of the content of the data subject's rights in point 3 of the information.

Google Analytics conversion tracking

Purpose of data processing: The Data Controller uses Google Analytics, a web analytics service provided by Google, Inc., a third-party service provider ("Google").

Google Analytics is used to evaluate the use of our website, to compile reports on website activity and other services related to website activity and internet usage. The information about your use of the website generated by the cookie is generally transmitted to and stored by Google on servers in the United States. This transfer is subject to Google's Privacy Shield certification and a separate data processing

agreement that we have concluded with Google:

https://support.google.com/analytics/answer/6004245?hl=de&ref_topic=291963 1
(Google Analytics data and data privacy)

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Data subject: User logged in to the website.

Data scope:

Google Analytics uses cookies to help analyze how users use the website. The information stored by the cookie (including the User's IP address) is stored on Google Inc. servers in the United States. Google Inc. may transfer the collected information to third parties if required to do so by law or if such third parties process the information on behalf of Google Inc.

On the Google Inc. website, Google Inc. You can find further useful information about its data-related activities and the blocking of cookies and the personalization of ads at: <https://adssettings.google.com/anonymous> Other information is available at: Google Analytics

[https://developers.google.com/analytics/devguides/collection/gtagjs/cookie usage](https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage)

Legal basis for data processing: Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), based on the legitimate interest of the Data Controller.

Description of the legitimate interest:

The purpose of using Google Analytics is to obtain information about your use of our website in order to compile statistical and business reports on the activities carried out on the website in order to improve it.

The customer is entitled to view the full text of the balancing test, which request can be submitted by letter to the email address in section 1.1.

Source of personal data and scope of data processed, if not provided to the Data Controller by the data subject

The Data Controller does not process personal data that is not collected from the data subject. Storage period of personal data: 1 year

Method of data storage: in the Data Controller's physically protected office premises, in its archives on paper and in its records management system electronically, accessible by persons with appropriate authorization according to internal regulations.

Recipients of personal data

The Data Controller's hosting service provider and as an independent Data Controller, Google Inc., 1600 Amphitheatre Parkway, Mountainview, California 94043, USA: <https://www.google.com/policies/privacy/>

You have the right to

- information, - access,
- rectification, - objection,
- restriction,
- and legal remedy regarding your personal data in connection with our data processing in connection with the use of Google Analytics.

The data subject may object to the processing of data, provided that there are no compelling reasons for the further processing of the personal data (for example, the assertion, exercise or defence of legal claims of the Data Controller), the processing of the data must be terminated and the data must be deleted.

You can find a description of the content of the data subject's rights in Section 3 of the information. Contact for business purposes

Purpose of data processing: The Data Controller processes the personal data of natural persons, customers, for the purpose of business contact. If the customer contacts us online, via telephone customer service or by post, or in

person, we record your questions so that we can provide you with the appropriate information.

Data Subject: Natural persons who have a business relationship with the Data Controller or who initiate a business relationship with the Data Controller and natural person contact persons of legal entity clients.

Data scope: name (surname, first name), telephone number, email address, postal address, position in the case of a legal entity, the question asked by the client, and the content of our response.

Categories of personal data	Purpose of data processing
last name and first name	necessary for the identification of the data subject
telephone number or mobile number	necessary for verbal communication with the data subject
e-mail address	necessary for addressing the response to be sent to the data subject
postal address	necessary for addressing the response to be sent to the data subject
position	in the case of a legal entity, the position of the contact person acting on its behalf is necessary to verify

	the existence of the right to represent
other data necessary for the identification of the data subject, as well as data communicated by the data subject in connection with the case or request, including possibly special categories of personal data	necessary for fulfilling the data subject's request

The legal basis for data processing:

in the case of a natural person, it is based on Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), the active consent of the individual

in the case of a legal person, it is based on Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), the legitimate interest of the Data Controller in providing the service

Description of the legitimate interest

The Data Controller's ongoing contact with its business partners, ensuring the flow of products, concluding and fulfilling contracts, and following the

conclusion of contracts, the Civil Code. In order to comply with the obligation to cooperate and provide information set out in Section 6:62 and thus avoid breach of contract or contractual delay, the legal entity and sole proprietor have a legitimate interest in processing certain specifically defined personal data of the natural person employees or persons in managerial positions designated as contact persons at their business partners. Without knowledge of these contact details, the contact necessary for the continuous maintenance of the business relationship, as well as the timely communication of other relevant information and data concerning it, would be completely impossible. The client is entitled to view the full text of the balancing of interests test, which request can be submitted in a letter to the email address in section 1.1. The source of the personal data and the scope of the processed data, if they were not provided to the Data Controller by the data subject. The Data Controller does not process personal data that it does not collect from the data subject. Recipients of the data processing: we forward it to the Data Controller's hosting service provider. Storage period of personal data: 12 months.

Method of data storage: in the Data Controller's physically protected office premises, in its archives on paper and in its records management system electronically,

accessible by persons with appropriate authorization according to internal regulations.

In relation to our contact data management, you have the opportunity to - information,

- access,
- correction,
- legal entity customer to object,
- private individual customer to delete, i.e. to withdraw consent, - restriction,
- and to exercise your right of legal remedy.

You can find a presentation of the content of the data subject rights in point 3 of the information. Private individual customer can withdraw their consent to contact at any time! Enforcement of legal claims

Purpose of data management: The Data Controller processes the personal data of natural person customers and buyers in connection with the enforcement of legal claims. The legal enforcement of claims arising from the contract and claims arising from non-contractual damages requires the processing of personal data.

Data subject: A person who is in a contractual relationship with the Data Controller or who has caused damage to the Data Controller. Data scope: surname, first name, title, address data (country, postal code, town, street name, house number) telephone number and email address, the content of the contract, in the event of damage, data related to the damage.

Categories of personal data	Purpose of data processing
surname and first name, title	necessary for the identification of the data subject
e-mail address	necessary for addressing the response to be sent to the data subject

postal address	necessary for addressing the response to be sent to the data subject
address details	data necessary for submitting a legal claim to a notary or court
contract details	data necessary for submitting a legal claim to a notary or court
damage details	data necessary for submitting a legal claim to an insurance institution to a notary or court
position	in the case of a legal person, the position of the contact person acting on its behalf is necessary to verify the existence of the right to represent

Legal basis for data processing: Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), based on the legitimate interest of the Data Controller.

Description of legitimate interest

In the case of data processing for the purpose of claiming and enforcing rights, we must use the data of the customers provided above in order to settle legal disputes arising from a contract with the customer or non-contractual damages, and to provide evidence in any litigation, non-litigation or other official proceedings. The Data Controller processes these data for evidentiary purposes within the limitation period, after the purpose of data processing cannot be achieved otherwise.

The customer is entitled to view the full text of the balancing of interests test, which request can be submitted by sending a letter to the email address in section 1.1.

Source of personal data and scope of data processed, if not provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject. Recipients of personal data and categories of recipients

The Data Controller may forward the data to a legal representative, competent court, MOKK (in the case of a payment order), or a court bailiff. Storage period of personal data: Until the end of the limitation period governing the enforcement of legal claims arising from the contract or damage. The general limitation period is 5 years.

Method of data storage: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

You have the right to

- information, - access,
- rectification, - objection,
- restriction,
- and to exercise your right to legal remedy regarding your personal data.

The data subject may object to data processing, if there are no compelling reasons that require further processing of the personal data (for example, the submission, enforcement or defense of the Data Controller's legal claims), the data processing must be terminated and the data must be deleted. You can find a presentation of the content of the data subject's rights in point 3 of the information. Sending newsletters and E-DMs

Purpose of data processing: The Data Controller provides marketing information about its business events, news and latest promotions by post or email.

Data subject: Natural persons who have subscribed to the newsletter or e-DM message and the natural person contacts of legal persons.

Data scope: Name provided by the subscriber (surname, first name, title), email address; in the case of a legal entity, the position of the contact person.

Categories of personal data	Purpose of data processing
last and first name, title	necessary for the identification of the data subject
email address	necessary for addressing the response to be sent to the data subject
subscription date	necessary for accountability and the date of deletion of the data

The legal basis for data processing is:

in the case of natural persons, voluntary, specific and adequately informed written consent (Article 6 (1) point a) of the GDPR);

in the case of legal persons, it is based on the legitimate interest of the Data Controller in recommending the service provided by the Data Controller pursuant to Article 6 (1) point f).

Description of the legitimate interest: The processing of personal data relating to employees of legal persons is essential for sending newsletters and information related to the Data Controller's activities to data subjects. The processing of personal data serves the interests of the data subjects, given that through the newsletters they can obtain first-hand information about the Data Controller's economic activities, various programs, promotions, events, and opportunities to participate in them. If the Data Controller does not process the data subject's data in order to achieve the present data processing purpose, the data subject's right to timely information and information about the above does not apply or is only limited. Based on the above, it can be concluded that data processing is necessary to achieve the purpose specified by the Data Controller.

The client is entitled to view the full text of the balancing test, which request can be submitted in a letter to the email address in point 1.1. Source of personal data and the scope of data processed, if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that is not collected from the data subject. Data transfer: the data is transferred to the Data Controller's hosting service provider. Storage period of personal data

The data is processed until the consent is withdrawn, but for a maximum of 3 years or until the purpose of data processing is achieved.

Method of data storage: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

You have the right to

- information,**
- access,**
- rectification,**
- erasure,**
- restriction,**
- data portability of your data processed in an automated manner, and to exercise your right to legal remedy in relation to our data processing relating to the newsletter.**

A private individual customer may withdraw their consent at any time. Our legal entity customer may exercise the right to object.

You can find a presentation of the content of the data subject rights in point 3 of the information. Publishing a customer opinion (comment) on the company's social media page

Purpose of data processing: In order to improve the quality of the service, data subjects may provide their opinion on the product or service provided by the Data Controller on the Data Controller's social media page.

Please do not provide personal information about yourself or others in your comments!

The Data Controller reserves the right to moderate, including the right to unilaterally remove, edit, or modify comments received on posts, in whole or in part, without justification or separate notice, for any reason, in particular if they violate the rights, interests, intellectual property rights, and reputation of individuals and/or legal entities, or are unnecessarily repetitive, violate generally accepted moral standards of society, or intentionally interfere with the expression of opinions. In addition, comments must not advertise any products or services.

The User acknowledges that the Data Controller is not responsible for the comments posted by the users, their attachments, the links, their content, and is not obliged to know the current content of the comments at all times, to check the content posted by the users, but if anyone draws its attention to offensive content that appears to be a violation of the terms of use or the law, based on its discretion, it removes the content, deeming it objectionable, unfair, in bad faith, or irrelevant to the topic for any reason.

In particular, the comments may not violate the honor, reputation, privacy, right to protection of personal data, right to image, sound recording, copyright, protected intellectual creation, right to trade secrets, and may not call for the commission of an illegal act or discrimination. By sending the comment 15 the User waives his/her right of disposal and cannot claim to store, display or delete the content elsewhere. By posting the content, the User grants the Service Provider a full, unlimited right of use – both in terms of territory and time – covering all methods of use.

We consider it important to inform our users that if a user deletes his/her profile or it is deleted, the content made accessible will also be deleted. By using the website, the User accepts that the user is solely responsible for the content and legality of the comments, and thus undertakes not to upload or make available illegal content.

Data Subject: Persons posting opinions on the Data Controller's social media page. **Data Scope:** The username provided by the data subject and the data subject's comment.

Categories of personal data	Purpose of data processing
last name and first name, or name provided by the user	identification of the data subject
text of the comment	necessary to fulfill the data subject's request
in the case of a public opinion about a product or service, the fact, time, and identifier of the commenter's purchase	necessary for the fact of verification of purchase

Legal basis for data processing: the data subject's voluntary, specific and informed consent (GDPR Article 6 (1) a)).

Source of personal data and scope of data processed, if not provided to the Data Controller by the Data Subject

The Data Controller does not process personal data that is not collected from the Data Subject. Data transfer to the Data Controller's hosting service provider and the Data Controller's social media service provider: Meta Platforms Ireland Ltd. 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland, performs its services as an independent Data Controller. Its data processing information is available at: <https://www.facebook.com/privacy/explanation>

Period of storage of personal data

The data will be processed until the consent is withdrawn, but no longer than for the purpose of data processing, and then deleted immediately. **Data storage method:** in the Data Controller's physically protected office premises, in its archives on paper and in its records management system electronically, accessible by persons with appropriate authorization according to internal regulations.

You have the right to

- information, - access,
- correction, - deletion,
- restriction,

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- data portability of your automatically processed data, - and to exercise your right to legal remedy in relation to our data management.

A private customer can withdraw their consent at any time

You can find a presentation of the content of the rights of the data subject in point 3 of the information.

Operation of a Facebook / Instagram / TikTok social network page Purpose of data management: The Data Controller exploits the appearance and communication opportunities provided by social networks in order to promote its products and services.

Data subject: Facebook users who click on and visit the Data Controller's Facebook page. **Data scope:** Image recording, Facebook ID, name given in Facebook profile

Categories of personal data	Purpose of data processing
the name, details and photo provided in the profile	To post a comment, the person concerned must have a Facebook profile, the data of which is partially public to other Facebook users.
comment text	necessary to fulfill the data subject's request
in the case of a public opinion written about a product or service, the fact, time and identifier of the commenter's purchase	necessary for the fact of verification of purchase

Legal basis for data processing: the voluntary, specific and informed consent of users (GDPR Article 6 (1) a)).

Source of personal data and scope of data processed, if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject. Period of storage of personal data

The data is processed until the consent is withdrawn, but no longer than the purpose of the data processing, and then deleted immediately. Method of data storage: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

Recipients and categories of recipients of personal data

to the Data Controller's hosting service provider and the operator of the Facebook social network, as an independent Data Controller, name: Meta Platforms Ireland Ltd., Registered office: 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland, Privacy Policy:

https://www.facebook.com/privacy/policy?section_id=8-HowLongDoWe

TikTok Information Technologies TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland. Privacy Policy:

<https://www.tiktok.com/legal/page/eea/privacy-policy/hu-HU>

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You have the right to

- information, - access,**
- rectification, - objection,**
- restriction,**
- and legal remedy regarding our data processing in relation to the social network.**

The data subject may object to data processing, provided that there are no compelling reasons for the further processing of the personal data (for example, the assertion, exercise or defence of legal claims by the Data Controller), the data processing must be terminated and the data must be deleted.

You can find a description of the content of the data subject's rights in Section 3 of the information.

SESSION ID, COOKIE Cookies required for technical reasons Purpose of data

processing: In order to maintain secure operation, the website sends a session-ID, a code string used to identify the data subject's machine when logging in. In order to provide the data subject with more effective service while browsing the website, short text or number string identification files (cookies) are placed on the data subject's machine.

Data subject: The data subject who logs in to the website.

Data scope: • the computer's Internet Protocol address (IP address),

• access data,

• the HTTP response code,

• data of the website from which the request was made,

• the amount of bytes transferred during the visit, • the time and length of the visit,

• data of the pages viewed • the time of first login

• number of logins

Legal basis for data processing: Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), based on the legitimate interest of the Data Controller.

Description of the legitimate interest:

The Data Controller "identifies" the users' machines in order to ensure the continuous operation of its website and to prevent unwanted external interference. The protection of the website cannot be ensured without the implementation of this process.

The customer is entitled to view the full text of the balancing of interests test, which request can be submitted by sending a letter to the email address in section 1.1.

Source of personal data and scope of data processed, if not provided to the Data Controller by the data subject

The Data Controller does not process personal data that is not collected from the data subject. **Data transfer:** the data is transferred to the Data Controller's hosting service provider.

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Method of data storage: the Data Controller's physically protected office premises, its archive on paper and its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

Storage period of personal data

Cookie ID	Service provider name	Cookie type	Purpose of application	Application duration today
element or wc_cart _ has h	quietcup		A cookie containing a unique identifier placed by the hosting provider, necessary for the security of the service. The data controller does not have access to the data stored on this basis.	constant

wc_fragment s	quietcup		A cookie containing a unique identifier placed by the hosting provider, necessary for the security of the service. The data controller does not have access to the data stored on this basis.	until the end of the session
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You have the right to

- information, - access,
- rectification, - objection,
- restriction,
- and to exercise your right to legal remedy regarding our personal data. The data subject may object to data processing, if there are no compelling reasons that require further processing of the personal data (for example, the submission, enforcement or defense of the Data Controller's legal claims), the data processing must be terminated and the data must be deleted.

You can find a presentation of the content of the data subject's rights in point 3 of the information.

Data processing of convenience and marketing optional cookies and social media buttons Purpose of data processing: In order to provide more convenient service to the data subject while browsing the website, short text or number string identification files (cookies) will be placed on the data subject's computer.

Data subject: The data subject who logs in to the website. Data

scope: • the computer's Internet Protocol address (IP address),

- access data,
- the HTTP response code,
- data of the website from which the request was made,
- the amount of bytes transferred during the visit, • the time and length of the visit,
- data of the pages viewed • time of first login
- number of logins

Legal basis for data processing: the data subject's voluntary, specific and appropriately informed consent (GDPR Article 6 (1) a)).

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Source of personal data and scope of data processed, if they have not been provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject. Data transfer: the data is transferred to the hosting provider. Method of data storage: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

Storage period of personal data

You have the right to

- information, - access,
- rectification, - erasure,
- restriction,
- data portability of your data processed in an automated manner, - and to exercise your right to legal remedy in relation to our data management related to convenience cookies.

You can withdraw your consent at any time in the cookie settings. You can find a presentation of the content of the data subject rights in point 3 of the information.

You can set the display of cookies in the most popular browsers using the following links:

Google Chrome	https://support.google.com/accounts/answer/61416?hl=hu
Firefox	https://support.mozilla.org/hu/kb/sutik-informacio-amely-et-weboldalak-tarolnak-szami
Microsoft Internet Explorer	https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11

Microsoft Edge	https://support.microsoft.com/hu-hu/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy	
Opera	https://help.opera.com/en/latest/web-preferences/#cookies	
Safari	https://support.apple.com/hu-hu/guide/safari/sfri11471/mac	

You have the right to

- information, - access,
- rectification, - objection,

- restriction,
- and to exercise your right to legal remedy regarding our personal data. The data subject may object to data processing, if there are no compelling reasons that require further processing of the personal data (for example, the submission, enforcement or defense of the Data Controller's legal claims), the data processing must be terminated and the data must be deleted.

You can find a presentation of the content of the data subject's rights in point 3 of the information.

Data processing of convenience and marketing optional cookies and social media buttons Purpose of data processing: In order to provide more convenient service to the data subject while browsing the website, short text or number string identification files (cookies) will be placed on the data subject's computer.

Data subject: The data subject who logs in to the website. Data

scope: • the computer's Internet Protocol address (IP address),

- access data,
- the HTTP response code,
- data of the website from which the request was made,
- the amount of bytes transferred during the visit, • the time and length of the visit,
- data of the pages viewed • time of first login
- number of logins

Legal basis for data processing: the data subject's voluntary, specific and appropriately informed consent (GDPR Article 6 (1) a)).

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Source of personal data and scope of data processed, if they have not been provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject. Data transfer: the data is transferred to the hosting provider. Method of data storage: in the Data Controller's physically protected office premises, in its archive on paper and in its document management system electronically, accessible by persons with appropriate authorization according to internal regulations.

Storage period of personal data

You have the right to

- information, - access,
- rectification, - erasure,
- restriction,
- data portability of your data processed in an automated manner, - and to exercise your right to legal remedy in relation to our data management related to convenience cookies.

You can withdraw your consent at any time in the cookie settings. You can find a presentation of the content of the data subject rights in point 3 of the information.

You can set the display of cookies in the most popular browsers using the following links:

Categories of personal data	Purpose of data processing
last name and first name	necessary for the identification of the data subject
email address	necessary for addressing the response to be sent to the data subject
phone number or mobile number	necessary for verbal communication with the data subject

Legal basis for data processing: Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), subject to Section 13/A

(1)-(2) of the Act on the Protection of Personal Data, data processing is necessary for the preparation and conclusion of a contract in which one party is the Data Controller and the other party is the individual concerned. Source of personal data and scope of data processed, if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that is not collected from the data subject. Storage period of personal data

We process the data until the conclusion of the contract, if no contract is concluded and the period of binding offer has expired without result, the data will be deleted immediately.

Data storage method: in the Data Controller's physically protected office premises, in its archives on paper and in its records management system electronically, accessible by persons with appropriate authorization according to internal regulations.

In connection with our data management related to registration on the website, you have the opportunity to exercise your right to

- information, - access,**
- correction, - deletion,**
- restriction,**
- data portability,**
- and legal remedy regarding your personal data.**

Payment of the service fee

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Purpose of data management: To settle the price of the Data Controller's product or service.

Data subject: the person paying for the Data Controller's product or service. Data scope: surname and first name, company name, sole proprietorship registration number, tax number, order identifier, product and service data, transfer time.

Legal basis for data processing: The processing is based on Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR) and is necessary for the preparation and conclusion of a contract between the Data Controller and the data subject.

Source of personal data and scope of data processed, if not provided to the Data Controller by the Data Subject

The Data Controller does not process personal data that it does not collect from the Data Subject. Recipients and categories of recipients of personal data The Data Controller forwards the data processed during the conclusion of the contract, invoicing and payment to the bank of the account holder, the company operating the bank card payment system, the accounting company, and the Tax and Customs Administration, legal representative, competent court, MOKK (in case of payment order), and court bailiff.

Data processor used for electronic invoicing

The Data Controller forwards the personal data and order data of the Users recorded during registration or ordering to KBOSS.hu Kft. (1031 Budapest, Záhony utca 7.; tax number: 13421739-2-41; Cg.01-09-303201), the operator of the szamlazz.hu website, for the purpose of electronic invoicing of the ordered products or services and storing the invoices. The personal data transmitted in this way are transferred to KBOSS.hu Kft. data processing information (available at the link:

<https://www.szamlazz.hu/adatvedelem/>).

Storage period of personal data: fulfillment of the obligation to preserve accounting documents pursuant to Section 169. (2) of Act C of 2000 on Accounting is 8 years. You have the right to exercise your right to

- information, - access,
- correction, - deletion,
- restriction,
- data portability,
- and legal remedy regarding your personal data in connection with our data processing related to the payment of the consideration for the product or service. Fulfillment of accounting obligations

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Purpose of data processing: The Data Controller is obliged to preserve the accounting documents in a readable form and in a retrievable manner for 8 years pursuant to Section 169. (2) of Act C of 2000 on Accounting. documents supporting the settlement.

Data subject: the person using a product or service from the Data Controller. Data scope: last and first name, address, sole proprietorship registration number, tax number, order identifier, product and service data, payment method.

Categories of personal data	Purpose of data processing
last name and first name	necessary for the identification of the data subject
address data	mandatory invoice data content
business registration number	
tax number	
order identifier, product, service data	
invoice amount, payment details	

Legal basis for data processing: Pursuant to Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), the fulfilment of a legal obligation applicable to the Data Controller. Source of personal data and scope of data processed, if not provided to the Data Controller by the data subject

The Data Controller does not process personal data that is not collected from the data subject. Recipients of personal data and categories of recipients The Data Controller forwards the data processed during the conclusion of the contract, invoicing and payment to the accounting company's bank, the company providing the online invoice, the online payment system provider and the National Tax and Customs Administration.

Storage period of personal data: fulfilment of the obligation to preserve accounting documents pursuant to Section 169. (2) of Act C of 2000 on Accounting, 8 years.

Data storage method: in the Data Controller's physically protected office premises, in its archives on paper and in its records management system electronically, accessible by persons with appropriate authorization according

to internal regulations.

You have the right to

- information, - access,
- correction, - restriction,
- and legal remedy regarding your personal data in connection with our data management related to our accounting obligations.

You can find a presentation of the content of the data subject rights in point 3 of the information.

Complaint handling

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Purpose of data processing: Complaint handling related to one of the services provided by the Data Controller, recording and preserving a record when handling warranty and guarantee claims, and issuing and preserving a receipt for a product received for repair or in order to examine the feasibility of a warranty/guarantee claim, returning the product to be repaired or replaced from the customer to the Data Controller's warehouse, and then re-delivering the replaced/repaired product.

Data subject: Those persons who report a complaint or a warranty or guarantee claim related to one of the services/products provided by the Data Controller to the Data Controller in person, by telephone, by e-mail, or on the contact form.

Data scope: order number, customer's name, address, e-mail address, telephone number, product name, purchase price, date of purchase and complaint, data necessary for investigating the complaint in the complaint description, personal data voluntarily provided by the customer, signature of the person recording the complaint and the person submitting the complaint, personal data used during the investigation of the complaint, and personal data included in the response to the complaint.

Személyes adatok kategória _i	Adatkezelés célja
last name and first name	necessary for the identification of the data subject
email address	necessary for addressing the response to be sent to the data subject
postal address	necessary for addressing the response to be sent to the data subject
phone number or mobile number	necessary for verbal communication with the data subject

the name of the product, its purchase price, the date of purchase and complaint, the data necessary for investigating the complaint in the description of the complaint, the personal data voluntarily provided by the buyer, the signature of the person recording the complaint and the person submitting the complaint, the personal data used during the investigation of the complaint, and the personal data included in the response to the complaint.	data necessary for the substantive investigation and handling of the complaint
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Legal basis for data processing: Article 6 (1) point c) of the GDPR; in accordance with paragraphs (3)-(5) of Section 17/A of the Consumer Protection Act, and with Section 4 (1) points a) and (6) of Section 6 (1) of the Minister of Justice Decree 19/2014 (IV. 29.) on the procedural rules for handling warranty and guarantee claims for things sold under a contract between a consumer and a business, and with Section 6 (1) point a).

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Source of personal data and scope of data processed if they were not provided to the Data Controller by the data subject

The Data Controller does not process personal data that it does not collect from the data subject.

Recipients of personal data and categories of recipients: territorially competent government agency.

Storage period of personal data

Fgytv. 17/A. § (7) 5 years from the date of recording the minutes, and the three year retention period prescribed for consumer protection complaint minutes based on § 4 (6) of Decree 19/2014. (IV. 29.) NGM.

Data storage method: the Data Controller's physically protected office premises, its archive on paper and its document management system electronically, can be accessed by persons with appropriate authorization according to internal regulations.

You have the opportunity to exercise your right to

- information, - access,**
- correction, - restriction,**

- and legal remedy regarding your personal data in connection with our data management related to complaint handling.

You can find a presentation of the content of the data subject's rights in point 3 of the information.

3. Presentation of data subject's rights related to data management 3.1. The right to transparent information

With this document, the Data Controller complies with its obligation to provide information on the Data Controller, the Data Protection Officer, the purpose and legal basis of data processing, its duration, the source of the data, the rights of the data subject and legal remedies.

3.2. Right of access

The data subject has the right to request information from the Data Controller regarding the processing of his/her personal data via the contact details provided in point 1.

is in progress, and if such data processing is in progress, you have the right to know • what personal data the Data Controller processes; • on what legal basis; • for what purpose of data processing;

- for how long it processes; and

- to whom, when, on the basis of what law, the Data Controller has provided access to which personal data or to whom the Data Controller has transmitted your personal data;

- from what source your personal data originate;

- whether the Data Controller uses automated decision-making and its logic, including profiling.

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The Data Controller shall provide the data subject with a copy of the personal data subject to data processing free of charge upon request for the first time, and may thereafter charge a reasonable fee based on administrative costs. In order to meet data security requirements and protect the rights of the data subject, the Data Controller is obliged to verify the identity of the data subject and the person wishing to exercise their right of access, and to this end, information, access to data, and the issuance of a copy thereof are also subject to the identification of the data subject.

The Data Controller considers a request sent by letter to be authentic if the data subject can be clearly identified based on the request sent. The Data Controller only considers a request for information sent by e-mail to be authentic if it is sent from the data subject's e-mail address, but this does not exclude the Data Controller from identifying the data subject in another way before providing the information. In order to fulfill the request, the Data Controller is obliged to verify that a person who is truly authorized to do so wishes to exercise their data subject rights. This may also require the data subject to appear in person at the Data Controller's registered office for the purpose of identification.

3.3. Right to rectification

The data subject shall have the right to obtain from the Controller, upon request, the rectification of inaccurate or incomplete personal data concerning him or her without undue delay. Taking into account the purpose of the processing, the data subject shall have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

If you or the Data Controller notice that personal data concerning him or her processed by the Data Controller are inaccurate, incorrect or otherwise inadequate, either at your request or on the Data Controller's own initiative, the Data Controller shall rectify the incomplete or incorrect data.

The data subject may request the Data Controller to amend any of his or her

personal data via the contact details provided in Section 3.10. If the data subject can credibly demonstrate the accuracy of the corrected data, the Data Controller shall comply with the request within a maximum of one month and shall notify the data subject thereof via the contact details provided.

3.4. Right to restriction of data processing

You may at any time request that the processing of some or all of the data you have provided to the Data Controller be restricted. In the event of a request for data deletion, the Data Controller will not delete the data, but will block it if the deletion would harm your legitimate interests. The Data Controller will only process the blocked data for as long as the purpose for which the data was blocked exists, after which the blocked data will also be deleted.

The data subject may request, via the contact details provided in point 3.10., that the processing of his or her personal data be restricted by the Data Controller (by clearly indicating the restricted nature of the data processing and ensuring separate processing from other data) if

- he or she disputes the accuracy of his or her personal data (in this case, the Data Controller will restrict the processing for the period during which the accuracy of the personal data is verified);
- the processing is unlawful and the data subject opposes the deletion of the data and instead requests the restriction of their use;
- the Controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or

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- the data subject has objected to the processing (in this case, the restriction shall apply for a period of time until it is established whether the legitimate grounds of the Controller override those of the data subject).

3.5. Right to object to processing

The data subject shall have the right to object at any time to processing of his or her personal data based on legitimate interests, on grounds relating to his or her particular situation. In such a case, the Controller shall no longer process the personal data unless the 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.

3.6. Right to erasure – “right to be forgotten”

Personal data must be erased if

1. the purpose of the processing has ceased to exist,
2. the data subject has withdrawn his/her consent and there is no other legal basis for the processing,
3. the processing is based on a legitimate interest or is in the public interest or is necessary for the performance of a task carried out in the exercise of official authority vested in the Data Controller and the data subject objects to the processing,
4. the processing is unlawful,
5. the personal data must be erased for compliance with a legal obligation to which the Data Controller is subject under Union or Member State law,
6. the data were erased in relation to information society services offered directly to children.

The Data Controller is not obliged to erase the data at the request of the data subject if one of the exceptions listed below applies. Personal data concerning the data subject may not be erased if the processing is necessary

1. for the exercise of the right to freedom of expression and information,
2. for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller,

3. for reasons of public interest in the field of public health,
4. for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, where the right to erasure is likely to render impossible or seriously jeopardise such processing,
5. for the establishment, exercise or defence of legal claims.

You may at any time request the permanent and irretrievable erasure of your personal data if the Controller processes your data with your consent. In the event of processing in the Controller's or your legitimate interests, or in the event of mandatory statutory storage and retention obligations, the Controller cannot delete your data. The Controller will delete the personal data once the purpose of the processing no longer applies. The Data Controller shall also delete the data if it is proven that the processing of the data is unlawful for some reason, or even if its deletion is legally ordered by an authority or court.

In connection with the data processing described in the information, the data subject may only exercise his/her right to deletion if the data is not necessary for the performance of the data processing task.

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3.7. Right to data portability

The data subject shall have the right to receive the personal data concerning him/her, which he/she has provided to a Data Controller, in a structured, commonly used and machine-readable format, and shall have the right to transmit these data to another Data Controller without hindrance from the Data Controller to whom the personal data have been provided, if the data processing is based on consent or a contract and the data processing is carried out by automated means.

When exercising the right to data portability, the data subject shall have the right – if technically feasible – to request the direct transmission of personal data between Data Controllers. The exercise of this right shall not prejudice the right to be forgotten.

The right to data portability shall only apply to personal data that the Data Controller processes about you in automated form and on the basis of your consent. 3.8.

Withdrawal of consent

You have the right to withdraw your consent to the processing of your personal data at any time without giving any reason. The Data Controller shall consider the withdrawal of consent sent by letter as authentic if the data subject can be clearly identified based on the request sent. The Data Controller shall only consider the withdrawal of consent sent by e-mail as authentic if it is sent from the e-mail address of the data subject, but this does not exclude the Data Controller from identifying the data subject in another way before providing the information.

The withdrawal of consent shall not affect the lawfulness of the data processing carried out by the Data Controller on the basis of consent before the withdrawal. 3.9.

The right of the data subject in the event of automated decision-making The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This provision shall not apply in the following cases:

1. it is necessary for entering into, or the performance of, a contract between the data subject and the Data Controller,
2. it is permitted by Union or Member State law applicable to the Data Controller and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or,
3. it is based on the data subject's explicit consent.

The Data Controller shall at least grant the data subject the right to request human intervention on the part of the Data Controller, to express his or her point of view and

to object to the decision.

In order to comply with the request, the Data Controller shall ensure that the data subject is indeed an authorised person wishing to exercise his or her rights as a data subject. This may - in justified cases - also require the data subject to appear in person at the Data Controller's premises for the purpose of identification. 3.10. How can you exercise your rights relating to your personal data against the Data Controller?

The Data Controller shall perform its tasks related to the exercise of the data subject's rights within 30 days of receipt of your request, or within 15 days in the event of an objection.

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Within 5 years after the death of the data subject, the rights to access, rectification, erasure, restriction of data processing and objection may be exercised by the Data Controller by the person authorized by the data subject by an administrative order or by a declaration made to the Data Controller in a public document/private document with full probative force. In the absence of such authorization, the rights to rectification and objection, and - if the data processing was already unlawful during the data subject's lifetime or the purpose of the data processing ceased with the death of the data subject - the rights to erasure and restriction of data processing may also be exercised by the data subject's close relative (spouse, lineal relative, sibling).

The person asserting the rights is obliged to prove the fact of the death of the data subject, his/her own identity and his/her status as a close relative to the Data Controller.

4. Recourse to legal remedies – alternative

options 4.1. Submitting a complaint to the Data Controller

If you have a problem with the Data Controller's data processing, you have the opportunity to directly contact the data controller with your complaint. 4.2.

Investigation that can be initiated at the National Data Protection and Freedom of Information Authority

Anyone can initiate an investigation by reporting to the National Data Protection and Freedom of Information Authority (hereinafter referred to as the Authority) on the grounds that a legal infringement has occurred or there is an immediate risk of such an infringement in connection with the processing of personal data. If the data subject does not agree with the decision made by the Data Controller, he/she may file a complaint against the possible legal infringement of the Data Controller with the National Data Protection and Freedom of Information Authority.

National Data Protection and Freedom of Information Authority 1055 Budapest Falk Miksa u. 9-11.

Mailing address: 1363 Budapest, PO Box 9.

Telephone: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu Website: www.naih.hu

4.3. Judicial enforcement

In the event of a violation of his or her rights, the data subject may bring proceedings against the Data Controller. The lawsuit against the Data Controller or the data processor must be initiated before the court of the Member State in which the Data Controller or the data processor is established. The proceedings may also be initiated before the court of the Member State in which the data subject has his or her habitual residence, unless the Data Controller or the data processor is a public authority of a Member State acting in the exercise of its public authority. In Hungary, the lawsuit may also be initiated before the court of the data subject's place of residence or residence, at the choice of the data subject. The data subject may claim compensation/damages from the Data Controller in the lawsuit:

a) if the Data Controller causes damage to another by unlawfully processing the data subject's data or by violating the data security requirements, he is obliged to compensate for it, b) if the Data Controller violates the data subject's personal rights by unlawfully processing the data subject's data or by violating the data security requirements, the data subject may claim damages from the Data Controller.

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5. Data processors commissioned by the Data Controller

The Data Controller uses the data processors listed in the table below to perform technical tasks related to data processing operations. The rights and obligations of the data processor in relation to the processing of personal data are determined by the Data Controller within the framework of the GDPR and separate laws relating to data processing. The Data Controller is responsible for the legality of the instructions given by it.

The data processor may not make any substantive decisions regarding data management, may only process the personal data that has come to its attention in accordance with the instructions of the Data Controller, may not process data for its own purposes, and must store and preserve personal data in accordance with the instructions of the Data Controller.

6. Presentation of data security measures

The Data Controller and its contractual partners involved in data management shall select and operate the IT tools used for the management of personal data in such a way that the data processed:

- is accessible to those authorized to do so (availability);
- its authenticity and authentication are ensured (authenticity of data management);
- its unchangeability can be verified (data integrity);
- is protected against unauthorized access (data confidentiality).

The Data Controller shall ensure the security of the data, take the technical and organizational measures and establish the procedural rules that are necessary to enforce the applicable laws, data protection rules and privacy rules. The Data Controller takes appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, and against inaccessibility resulting from changes in the technology used.

The Data Controller and the data processors shall implement appropriate technical and organizational measures, taking into account the state of the art and technology and the costs of implementation, the nature, scope, circumstances and purposes of data processing, and the varying likelihood and severity of the risk to the rights and freedoms of natural persons, in order to guarantee a level of data security appropriate to the degree of risk. Within the framework of the above, the Data Controller shall:

- ensure measures to protect against unauthorized access, including the protection of software and hardware devices, and physical protection (access protection, network protection);
- take measures to ensure the possibility of restoring data files, ensure regular backups;
- take measures to protect against viruses.

The Data Controller informs you that electronic messages transmitted over the Internet, regardless of the protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that can be traced back to dishonest activity or lead to the disclosure or modification of information. However, the Data Controller takes all reasonable precautions to prevent these. It monitors the systems in order to record any security deviations and provide evidence in the event of any security incident. The Data

Controller also ensures the effectiveness of the precautions taken by monitoring the systems.

7. Our procedure in the event of a data protection incident

If the data protection incident is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the data subject about the data protection incident without undue delay.

The information provided to the data subject shall describe in a clear and comprehensible manner the nature of the data protection incident and the name and contact details of the data protection officer or other contact person who can provide further information; describe the likely consequences of the data protection incident; describe the measures taken or planned by the Data Controller to remedy the data protection incident, including, where applicable, measures to mitigate any adverse consequences resulting from the data protection incident.

The data subject shall not be informed if any of the following conditions are met: 1. the Data Controller has implemented appropriate technical and organisational protection measures and these measures have been applied to the data affected by the data protection incident, in particular measures such as the use of encryption that render the data unintelligible to persons not authorised to access the personal data; 2. the Data Controller has taken additional measures following the data protection incident to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialise in the future; 3. providing information would involve a disproportionate effort. In such cases, the data subjects must be informed by means of publicly published information or a similar measure must be taken to ensure that the data subjects are informed in a similarly effective manner.

If the Data Controller has not yet notified the data subject of the data breach, the supervisory authority may, after considering whether the data breach is likely to involve a high risk, order the data subject to be informed.

A data breach can be reported online at the following interface:

<https://naih.hu/adatvedelmi-incidensbejelent--rendszer.html>

8. Automated decision-making and profiling

The Data Controller does not carry out automated decision-making or profiling in relation to its customers and partners. The data obtained during the customer satisfaction survey is processed solely for statistical and business policy decisions, in anonymized form, based on legitimate interest.

9. Annexes

Annex 1 - Definitions Annex 2 - Applied legislation

Annex 3 - Data of employed data processors Effective from 01.06.2023.

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Annex 1 - Definitions

“personal data”: any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“processing”: any operation or set of operations which is performed on personal data or on data sets, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Controller” means the natural or legal person, public authority, agency or any other

body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the Controller or the specific criteria for the designation of the Controller may also be determined by Union or Member State law;

“Controller within the meaning of the data protection notice” means the Controller
“processor” means the natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Controller; “recipient” means the natural or legal person, public authority, agency or any other body to which personal data are disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law shall not be considered recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

“third party” means a natural or legal person, public authority, agency or any other body other than the data subject, the Controller, the processor or persons who, under the direct control of the Controller or the processor, are authorised to process personal data;

“consent of the data subject” means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which the data subject, by a statement or by a clear and unambiguous indication of his or her consent, signifies agreement to the processing of personal data relating to him or her; **‘restriction of processing’ means the marking of stored personal data with a view to restricting their future processing;**

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‘profiling’ means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal characteristics relating to a natural person, in particular to analyse or predict characteristics relating to performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
‘pseudonymisation’ means the processing of personal data in such a way that the personal data can no longer be identified without the use of additional information, provided that such additional information is stored separately and that technical and organisational measures are taken to ensure that the personal data cannot be attributed to an identified or identifiable natural person;

“filing system”: a set of personal data, whether centralised, decentralised or functionally or geographically structured, which is accessible on the basis of specific criteria;

“data breach”: a breach of security which results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

“biometric data”: any personal data relating to the physical, physiological or behavioural characteristics of a natural person obtained by means of specific technical procedures which allow or confirm the identification of that natural person, such as facial image or dactyloscopic data;

“data concerning health”: personal data relating to the physical or mental health of a natural person, including data relating to health services provided to that natural person which contain information on the health of that natural person;

“undertaking”: any natural or legal person engaged in an economic activity, regardless of its legal form, including partnerships and associations engaged in regular economic activities;

“supervisory authority”: an independent public authority established by a Member State in accordance with Article 51, in Hungary the National Data Protection and Freedom of Information Authority

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Annex No. 2 – Applied legislation

On the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (General Data Protection Regulation) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (GDPR) (27 April 2016)
Act CXII of 2011 – on the right to informational self-determination and freedom of information (hereinafter: the Infotv.)

Act CVIII of 2001 Act – on certain issues of electronic commerce services and information society services (especially Section 13/A)

Act XLVII of 2008 – on the prohibition of unfair commercial practices towards consumers;

Act XLVIII of 2008 – on the basic conditions and certain limitations of economic advertising activities (especially Section 6)

Act XC of 2005 on electronic freedom of information Act C of 2003 on electronic communications

Act LIII of 2017 on the prevention and suppression of money laundering and terrorist financing (Pmt.);

Act CLV of 1997 on consumer protection;

Opinion No. 16/2011 on the EASA/IAB recommendation on best practice in online behavioural advertising

Recommendation of the National Data Protection and Freedom of Information Authority on data protection requirements for prior information.

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Annex 3 - Data of employed data processors

Data processor type	Company name:	Headquarters:
Accounting/Payroll		
Internet service provider	Magyar Telekom Telecommunications Public Limited Company	1097 Budapest, Könyves Kálmán közút 36.
Telephone provider	Magyar Telekom Telecommunications Public Limited Company	1097 Budapest, Könyves Kálmán közút 36.
Name of online invoicing company or software	KBOSS.hu Kft.- számla- sz.hu	1031 Budapest Záhony utca 7.