

# Privacy Policy

## 1. PROTECTION OF PERSONAL DATA, BASIC PRINCIPLES

Principles governing the processing of personal data:

Personal data;

- must be processed lawfully and fairly and in a transparent manner for the data subject ("**lawfulness, fairness and transparency**");
- collected only for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes ("**purpose limitation**");
- adequate and relevant in relation to the purposes for which the data are processed and limited to what is necessary ("**data economy**");
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data which are inaccurate in relation to the purposes for which they are processed are erased or rectified without delay ("**accuracy**");
- 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 ("**storage limitation**");
- processing must be carried out in such a way that appropriate technical or organizational measures are applied to ensure the appropriate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage to data ("**integrity and confidentiality**").

The Data Controller shall act in accordance with the above principles in all data processing activities and shall take the necessary measures to demonstrate compliance with the principles of data processing ("**accountability**").

Legal basis for the processing of personal data:

Data processing may only be carried out if the appropriate legal basis is available. In the absence of an appropriate legal basis, data processing may not be lawfully carried out.

Such legal basis may include:

- if the data processing was based on a legal basis, i.e. necessary for the fulfillment of legal obligations to the Data Controller (e.g. fulfillment of invoicing obligations)
- if the data subject has given consent to the processing of their personal data for one or more specific purposes (e.g. consent to sending a newsletter)
- if it was based on the legitimate interest of the Data Controller (e.g. data processing during contact)
- if the data processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract; (e.g. fulfillment of a web order)
- if the data processing is necessary to protect the vital interests of the data subject or another natural person (e.g. measures taken in connection with accident prevention).

## 2. DEFINITIONS

**Data Processor:** the natural or legal person, public authority, agency or any other body which processes Personal Data on behalf of the Data Controller.

**Data Processing:** any operation or set of operations which is performed on Personal Data or on data files, 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.

**Restriction of processing:** the marking of stored Personal Data with a view to restricting their future processing.

**Data Controller:** 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 aspects of the designation of the Controller may also be determined by Union or Member State law.

**Data Protection Incident:** 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.

**Pseudonymisation:** The processing of Personal Data in such a way that, without the use of additional information, it can no longer be determined that the Personal Data relate to a specific natural person, 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.

**Consent of the Data Subject:** any freely given, specific, adequately informed and unambiguous indication of the Data Subject's wishes by which the Data Subject, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data concerning them.

**Identifiable natural person:** any natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification 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.

**Recipient:** any natural or legal person, public authority, agency or any other body which the Personal Data are disclosed to, whether a third party or not. Public authorities that have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not considered recipients, the processing of such data by such public authorities must comply with the applicable data protection rules in accordance with the purposes of the Processing.

**Data Subject:** any natural person who is identified or identifiable on the basis of any information.

**Third Party:** any natural or legal person, public authority, agency or any other body other than the Data Subject, the Controller, the Processor or the persons who are authorised to process Personal Data under the direct control of the Controller or the Processor.

**Law/legislation/legal obligations:** Hungarian and European Union legislation in force at all times.

**Special Data:** Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic and biometric data for the purpose of uniquely identifying natural persons, health data and Personal Data concerning the sex life or sexual orientation of natural persons:

- **genetic data:** any Personal Data relating to the inherited or acquired genetic characteristics of a natural person, which contain unique information concerning the physiology or health of that person and which results primarily from the analysis of a biological sample taken from that natural person;
- **biometric data:** any Personal Data relating to the physical, physiological or behavioural characteristics of a natural person, obtained by means of specific technical processes, which allow or confirm the unique identification of the natural person, such as facial image or dactyloscopic data;
- **health data:** Personal Data relating to the physical or mental health of a natural person, including data relating to healthcare services provided to the natural person that carries information about the health status of the natural person.

**"Profiling":** 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 their performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**Personal Data:** any information relating to an identified or identifiable natural person. 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.

## 3. DATA CONTROLLER INFORMATION

Data Controller: **ÉremVerde Iparművészeti Gyártó és Kereskedelmi Kft.**

Address: 6725 Szeged, Kolozsvári tér 11.

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

#### 4. CONTACT INFORMATION OF THE DATA PROTECTION OFFICER

**Tamás Szabó** Data Protection Officer

direct contact information:

address: 6725 Szeged, Kolozsvári tér 11.

e-mail: [iroda@eremverde.hu](mailto:iroda@eremverde.hu)

telephone: +36 20 9259500

#### 5. PROCESSED PERSONAL DATA

Data processing	Purpose	Legal Basis	Data processed	Data Deletion Deadline
Contact, handling inquiries	The purpose of data management is to enable the Data Controller to answer and react to your questions and requests, thereby complying with your request as much as possible.	Consent of the data subject GDPR Article 6 (1) point a)	Full name, email address, phone number, and personal data included in the question asked.	The Data Controller processes data until the question is resolved. The request you have submitted is resolved.
Customer Service Sales - Invoicing	The purpose of data processing is customer service. It is necessary to fulfill the order(s).	Consent of the data subject GDPR Article 6 (1) point a)	Full name, address, and in the case of a company, tax number.	The Data Controller processes data based on consent as long as the purpose of processing exists, taking into account the taxation regime.
Cookie management	The Data Controller uses cookies on its website to ensure the operation of its website and improve the user experience, as well as to analyze the user's activity through the website.	Consent of the data subject GDPR Article 6 (1) point a)	Data about the user's computer; the IP address used by the visitor, the type of browser, the characteristics of the operating system of the device used for browsing (set language), time of visit, the (sub)page, function or service visited.	The Data Controller processes data until you withdraw your consent (prohibition of cookie use).

#### 6. RECIPIENTS OF DATA MANAGEMENT, DATA PROCESSORS

Recipient	Purpose
Kulcs-Soft Kft.	Invoicing
UNAS Online Kft.	Hosting service provider
Google Ireland Ltd.	Usage of Google services
Barion Payment Zrt.	Preparing and providing the service(s) you want to use

The Website may contain links and jump points that originate from third parties who are not affiliated with the Data Controller. It may happen that these third parties also place content, cookies, web beacons on the user's computer, or collect data using similar technologies. In such cases, the data protection regulations specified by these third parties are applicable to data processing, and the Data Controller assumes no liability for such data processing.

The Data Controller assumes no liability for the content, data and information protection practices of external websites accessible as jump points from the Website. If the Data Controller becomes aware that the page or link it links to violates the rights of data subjects or applicable laws, they will immediately remove the link from the Website.

#### 7. DATA SECURITY MEASURES

In order to guarantee an adequate level of data security, the Data Controller has assessed the risks arising from its data processing in its internal Data Processing Policy and has evaluated them according to various aspects in terms of the severity of the risks and the likelihood of occurrence.

The Data Controller ensures the necessary authorization management, internal organizational and technical solutions in the operation of the IT systems in connection with its website so that unauthorized persons cannot obtain access to your data, and that unauthorized persons cannot delete, save or modify the data. We also enforce the data protection and data security requirements against our data processors.

We keep records of any data protection incidents and, if necessary, inform you about any incidents that arise.

The computers owned by the Data Controller are provided with appropriate passwords and virus protection programs, and stores its servers in a locked room with controlled access and air conditioning. The Data Controller regularly backs up its servers and disposes of its IT equipment based on the relevant disposal protocol.

In the event of data transfer, the Data Controller records the reason and time of access to the data in the protocol and keeps a data transfer record in accordance with the provisions of the GDPR.

#### 8. RIGHTS OF DATA SUBJECTS AND LEGAL REMEDIES

You have the right to request information at any time by post, electronic or telephone via the contact details specified in the information about the personal data we process concerning you.

Upon request, we will inform you about:

- the data processed,
- the purpose of the data processing,
- its legal basis,

- its duration,
- who receives or has received your data and for what purpose.

The information will be provided in writing within 30 days of submitting the request, either on paper or electronically, depending on the form of the request for information.

You may **object** to the processing of your personal data at any time. We will examine the objection as soon as possible after its submission, but no later than 30 days, make a decision on its validity, and inform you of the decision.

You have the right to request the **deletion** of the personal data we process or the **correction** of incorrectly recorded personal data at any time.

In addition, we will **block** your personal data if you request it or if, based on the information available to us, it can be assumed that deletion would harm your legitimate interests. We will process personal data blocked in this way for as long as the purpose of the data processing or legitimate interest that precluded the erasure of the personal data exists.

The data subject may, via the contact details provided in this notice, request that the Controller **restricts** the processing of their personal data (with a clear indication of the limited nature of the data processing and ensuring separate processing from other data) if

- they contest the accuracy of their personal data (in which case the Controller shall 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 requests the restriction of their use instead;
- 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
- the data subject has objected to the processing (in this case, the restriction shall apply for the period until it is determined whether the legitimate grounds of the data controller override those of the data subject).

You have the right to receive the personal data concerning you, which you have provided to the Data Controller, in a structured, commonly used and machine-readable format, via the contact details provided in this notice, and you have the right to transmit these data to another data controller without hindrance from the Data Controller.

We will comply with and notify you of your request for access, deletion, rectification, restriction, data portability and blocking as soon as possible, but no later than 30 days. If we were unable to comply with your request, we will also notify you within 30 days.

If we have forwarded the data to another person with your consent, we will also notify the recipient of the data transfer of the necessary steps.

If we process your personal data based on your consent, you have the right to withdraw your consent at any time. You may withdraw your consent by contacting the Data Controller or the Data Protection Officer at the contact details set out in this Notice, if otherwise justified.

**If you are visually impaired or elderly, you may request the Data Controller - via the contact details set out in this Notice or the Data Protection Officer - to provide the content of the Notice in word (text) format or in large print.**

In addition, **you have the right to lodge a complaint with the**

**National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa u. 9-11.

www.naih.hu

Phone: +36 1 3911400

Fax: +36 1 3911410

E-mail: ugyfelszolgalat@naih.hu

to contact or enforce your rights regarding the processing of personal data before the Court with jurisdiction and competence according to Act CXXX of 2016 on the **Code of Civil Procedure**.

The responsible court can be found at the following link:

<https://birosag.hu/szegedi-torvenyszek>

You can exercise your rights listed in this information at any time by contacting the Data Controller or the Data Protection Officer in writing or by e-mail. In connection with your request, you may be asked to identify yourself or provide other personal data that serves to prove your rights.

You can contact the Data Controller via the contact details set out in point 3 and via the data protection officer indicated in point 4.

**ÉremVerde Kft.**

Data Controller