# PRIVACY NOTICE

## INTRODUCTION

During the operation of the website data controller processes the data of persons registered on the website in order to be able to provide them with adequate services.

Service provider intends to fully comply with the regulations set forth in the legislation regarding personal data processing, particularly the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council.

This privacy notice concerning the protection of the personal data of natural persons and the free movement of such data was made in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council, taking into consideration the content of Act CXII of 2011 on informational self-determination and freedom of information.

## DATA CONTROLLER'S DESCRIPTION

Name / company name: MOGYI Kereskedelmi Kft. Registered office: H-6448 Csávoly, Petőfi S. u. 29.

Tax number: 10411030-2-03

Registration number (at the Hungarian National Authority for Data Protection and Freedom of

Information (NAIH)) 2018\BAF\000044

Website: www.mogyi.hu

The privacy notice is available at: www.mogyi.hu/pdf/Mogyi-adatvedelmi-tajekoztato-180830.pdf

#### **DEFINITIONS**

- GDPR (General Data Protection Regulation) is the new Data Protection Regulation of the European Union:
- data processing: any operation or set of operations which is performed on personal data or on sets of personal data, 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;
- processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 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, 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;
- controller: the natural or legal person, public authority, agency or 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

- recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

#### DATA PROTECTION GUIDELINES

Data controller states that it processes personal data in compliance with the privacy notice and observes the regulations of the relevant legislations, with special regard to the following:

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

Personal data shall be collected for specified, explicit and legitimate purposes.

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Personal data shall be accurate and kept up to date. Inaccurate personal data shall be erased without delay.

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary. Personal data may be stored for longer periods insofar as the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The principles of data protection should apply to any information concerning an identified or identifiable natural person.

## IMPORTANT DATA PROTECTION INFORMATION

The purpose of data processing is to enable the service provider / data controller to provide adequate additional services during the operation of the website to the persons registered on the website.

The legal basis of data processing is the consent provided by the person concerned.

The persons involved in data processing are the registered website users.

Period of data processing and erasure of data. The period of data processing shall always depend on the specific purpose of use; however, data shall be erased without delay if the original goal has already been achieved. The person concerned may withdraw its consent to data processing at any time by sending an email to the email address for contact. If erasure has no legal obstacles, his/her data will be erased.

Data controller and its employees shall be entitled to acquaint themselves with the data.

The person concerned may request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or object to processing as well as the right to data portability.

The person concerned may withdraw its consent to data processing at any time, but it shall not concern the lawfulness of data processing performed before the withdrawal of the consent.

The person concerned may exercise its right to lodge a complaint with a supervisory authority.

If the person concerned wishes to use the benefits provided upon registration, i.e. he/she intends to use the service of the website in connection therewith, the required personal data shall be provided. The person concerned shall not be obliged to provide personal data; failure of data provision shall not adversely affect the person concerned in any way. However, some functions of the website are not available without registration.

The person concerned shall be entitled to request the data controller to rectify or complete the inaccurate personal data concerning him/her without undue delay.

The person concerned shall have the right to obtain from the controller the erasure of inaccurate personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data regarding the person concerned without undue delay where data processing has no other legal ground.

The modification or erasure of personal data may be requested via email, telephone or letter via the contact details indicated above.

#### REGISTRATION ON THE WEBSITE

The purpose of data processing is to provide additional services and establish contact.

The legal basis of data processing upon registration is your consent.

The persons involved in data processing are the registered website users.

The period of data processing. Data processing is performed until consent withdrawal. You may withdraw your consent to data processing at any time by sending an email to the email address for contact.

Data are erased upon the withdrawal of the consent to data processing. You may withdraw your consent to data processing at any time by sending an email to the email address for contact.

Data controller and its employees shall be entitled to acquaint themselves with the data. Way of storing the data: electronic.

The modification or erasure of personal data may be requested via email, telephone or letter via the contact details indicated above.

Providing personal data is absolutely essential for identification in databases and contact. The accurate company name and address are necessary for invoicing which is a legal obligation.

Set of processed data Specific purpose of processed data Name Identification, contact, invoicing.
Company name Identification, contact, invoicing.
Address Identification, contact, invoicing.
Email Identification, contact.
Telephone number Identification, contact.
Date of registration Technical information measure.
IP address Technical information measure.

User may provide its consent to data processing by intentionally putting a tick in the empty checkbox designated for this purpose on the website.

You as a person concerned may object to the processing of your personal data; with regard thereto, you shall be entitled to the procedure specified in the data processing information detailed above, in this privacy notice, as well as the legislation set forth herein.

## ORDER PLACEMENT

The purpose of data processing is to provide additional services, establish contact and send a confirmation email. We will be able to complete your order only if you provide your contact and invoicing details which are absolutely essential for contact and invoicing.

The legal basis of data processing is your consent. In the case of invoicing data processing is based on legislation.

The persons involved in data processing are the registered website users.

The period of data processing. Data processing is performed until it is necessary in accordance with the legal regulations or the consent is withdrawn. You may withdraw your consent to data processing at any time by sending an email to the email address for contact.

Data are erased upon the withdrawal of the consent to data processing. You may withdraw your consent to data processing at any time by sending an email to the email address for contact. Invoicing data may be erased in accordance with legal regulations.

Data controller and its employees shall be entitled to acquaint themselves with the data.

Way of storing the data: electronic.

The modification or erasure of personal data may be requested via email, telephone or letter via the contact details indicated above.

Set of processed data Specific purpose of processed data Name Identification, contact, invoicing. Company name Identification, contact, invoicing. Address Identification, contact, invoicing. Email Identification, contact.

Telephone number Identification, contact.

Data of the ordered product Identification of the product. Date of registration Technical information measure.

IP address Technical information measure.

User may provide its consent to data processing by intentionally putting a tick in the empty checkbox designated for this purpose on the website.

The person concerned may object to the processing of his/her personal data; with regard thereto, he/she shall be entitled to the procedure specified in the data processing information detailed above, in this privacy notice, as well as the legislation set forth herein.

## ISSUE OF INVOICES

The purpose of data processing is to issue and send electronic invoices as email attachment. The legal basis of data processing is mandatory data processing specified in the legislation.

The persons involved in data processing are the buyers of the service provider.

The period of data processing. Data processing is performed until it is necessary in accordance with the legal regulations or the consent is withdrawn. You may withdraw your consent to data processing at any time by sending an email to the email address for contact.

Data are erased upon the withdrawal of the consent to data processing. You may withdraw your consent to data processing at any time by sending an email to the email address for contact. Invoicing data may be erased in accordance with legal regulations.

Data controller and its employees shall be entitled to acquaint themselves with the data. Way of storing the data: electronic.

The modification or erasure of invoicing data may be requested via email, telephone or letter via the contact details indicated above.

Set of processed data Specific purpose of processed data Name Identification, contact, invoicing.
Company name Identification, contact, invoicing.
Address Identification, contact, invoicing.
Email Identification, contact.
Telephone number Identification, contact.
Tax number / tax identification number Identification of the buyer. Invoicing data Identification of the invoice.
Date of the issue of the invoice Technical information measure.

User may provide its consent to data processing by intentionally putting a tick in the empty checkbox designated for this purpose on the website.

The person concerned may object to the processing of his/her personal data; with regard thereto, he/she shall be entitled to the procedure specified in the data processing information detailed above, in this privacy notice, as well as the legislation set forth herein.

#### SENDING NEWSLETTERS

The data controller does not send newsletters to users visiting the website and registered thereon.

If in the extraordinary case of sending a newsletter, as the website operator we declare that we fully comply with the relevant legal provisions with regard to the information and descriptions published by us. We also state that upon subscription to newsletters we are not able to check the authenticity of contact details and to determine whether the data provided relate to a private person or a company. We handle the companies contacting us as clients.

The purpose of data processing is to send professional descriptions, electronic messages containing advertisements, information and newsletters; you may unsubscribe from these at any time without consequences. You may also unsubscribe without consequences if your company ceased to exist in the meantime, you quit the company or somebody else provided us with your contact details.

The legal basis of data processing is your consent. We inform you that the user may preliminarily and expressly authorise the service provider to contact him/her with its advertisements, information and other emails via the email address provided upon registration. Consequently, the user may give his/her consent to service provider to process his/her personal data necessary for this purpose.

We inform you that if you wish to receive newsletters from us, you are required to enter the necessary data. If the data are not provided, we will not be able to send you newsletters.

The period of data processing. Data processing is performed until consent withdrawal. You may withdraw your consent to data processing at any time by sending an email to the email address for contact.

Data are erased upon the withdrawal of the consent to data processing. You may withdraw your consent to data processing at any time by sending an email to the email address for contact.

Consent may also be withdrawn via the link to be found in the sent newsletters.

Data controller and its employees shall be entitled to acquaint themselves with the data.

Way of storing the data: electronic.

The modification or erasure of data may be requested via email, telephone or letter via the contact details indicated above.

We inform you that it is not necessary to include data referring to your identity in the username or in the email address. For example, you are not requested to include your name in your username or email address. You may freely decide to provide a username or email address that contains information referring

to your identity. The email address used for keeping contact is absolutely necessary to send the newsletters or professional information to you.

#### COOKIES

Cookies are placed by the visited website on the user's computer and contain information, such as website settings or login status.

Therefore, cookies are small files created by the visited websites. They improve user experience by saving browsing data. Cookies enable the website to remember the website settings and offer locally relevant content.

The service provider's website sends a small file (cookie) to the computers of the visitors of the website so that the fact and date of the visit may be established. Service provider informs the visitor of the website thereabout.

The persons involved in data processing are the visitors of the website.

The purpose of data processing is to provide additional services, identify, and monitor the visitors.

Legal basis of data processing. User's consent is not required if the use of cookies is absolutely necessary for the service provider.

Data set: unique ID number, date, setting information.

The user may delete cookies from the browsers at any time in Settings.

Data controllers entitled to acquaint themselves with the data. By using cookies, the data controller does not process personal data.

Way of storing the data: electronic.

### SOCIAL MEDIA SITES

Social media sites are media tools where messages are distributed through social media users. Social media uses the internet and online publishing opportunities to turn users from content recipients into content editors.

Social media is the platform of online applications where the content created by users can be found, for example Facebook, Google+, Twitter, Pinterest, etc.

Social media may take the following forms: public talks, performances, presentations, product or service information.

The information published in the social media may take the following forms: forums, blog entries, images, videos and audio, newsfeed, emails, etc.

Based on the above, the set of processed data may include the user's public profile picture apart from his/her personal data.

Persons concerned: every registered user.

The purpose of data collection is to promote the website or relating websites.

The legal basis of data processing is the voluntary consent provided by the data subject.

Period of data processing: based on the regulation available on the given social media site.

Deadline for the erasure of data: based on the regulation available on the given social media site.

Persons entitled to become familiar with the data: based on the regulation available on the given social media site.

Rights relating to data processing: based on the regulation available on the given social media site.

Way of storing the data: electronic.

It is important to consider the fact that when the user uploads or sends personal data, he/she gives a globally valid permit to the operator of the social media site to store and use such content. Therefore, it is of utmost importance to make sure that the user is fully entitled to provide the disclosed information.

## **GOOGLE ANALYTICS**

Our website does not use the Google Analytics application.

#### RIGHTS RFI ATING TO DATA PROCESSING

#### Right of information

Via the given contact details, you may request information from us about your data processed by us, the legal basis and purpose of their processing, the source of information and the period of processing. We will send the information immediately upon your request, but no later than 30 days to the email address provided by you.

#### Right to rectification

You may request us to modify any of your data via the given contact details. We will take measures immediately upon your request, but no later than 30 days and send information to the email address provided by you.

#### Right to erasure

You may request us to erase your data via the given contact details. We will act immediately upon your request, but no later than 30 days and we will send information to the email address provided by you.

#### Right to data blocking

You may request us to block your data via the given contact details. Blocking is performed until the data need to be stored based on the cause specified by you. We will act immediately upon your request, but no later than 30 days and we will send information to the email address provided by you.

#### Right to object

You may object to the processing of your data via the given contact details. The objection will be reviewed within the shortest possible period, but no later than 15 days following the submission of the request; we will judge its merits and notify you in email about our decision.

#### The opportunity to exercise rights relating to data processing

If you become aware of unlawful data processing, inform our company, therefore it will be possible to restore the lawful situation within a short period of time. We will do our best in your interest to solve the specified problem.

# IF YOU BELIEVE THAT THE LAWFUL CONDITION CANNOT BE RESTORED, INFORM THE AUTHORITY THEREOF VIA THE FOLLOWING:

Hungarian National Authority for Data Protection and Freedom of Information

Postal address: H-1530 Budapest, Pf.: 5.

Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c

**Telephone:** +36 (1) 391-1400

Fax: +36 (1) 391-1410

Email: ugyfelszolgalat (at) naih.hu

URL: https://naih.hu

Coordinates: N 47°30'56"; E 18°59'57"

### LEGISLATION SERVING AS A BASIS FOR DATA PROCESSING

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (of 27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- Act CXII of 2011 on informational self-determination and freedom of information.
- Act LXVI of 1995 on the protection of public documents, public archives and private archive materials.
- Government Decree No. 335/2005 (XII. 29.) on the common provisions of the document management in public administrative bodies.
- Act CVIII of 2001 on certain issues of electronic commerce activities and information society services.
- Act C of 2003 on electronic communications.