

# Privacy Statement

CSEPREGI ÉS TÁRSA Kft respects the privacy rights of its Internet users. In accordance with the Hungarian rules of law in force, by registering on the Internet sites of <http://csepregi.hu/> and by subscribing to their newsletters you agree that CSEPREGI ÉS TÁRSA Kft. can use your data, by carrying out data collection activities through subscribing to newsletters if necessary, in compliance with the cited regulation.

Please note that communication of data is voluntary, you are entitled to be informed on data management at all times, to make corrections to your data, and also to require to be erased from our data base personally at the CSEPREGI ÉS TÁRSA Kft (7090 Tamási, Szabadság str. 92/a), or by sending an e-mail to the following e-mail address: [info@csepregi.hu](mailto:info@csepregi.hu). We do not take responsibility for the validity of the data provided by you. Data management registration identification: NAIH-89728/2015.

## 1. Data Controller:

This Data Management Policy and Information on Data Management (hereinafter: Data Management Policy) includes the Users' (hereinafter Users) data protection informant as well as the data management policy for the Users of [www.csepregi.hu](http://www.csepregi.hu) (hereinafter the Website) operated by CSEPREGI ÉS TÁRSA Kft (7090 Tamási, Szabadság str. 92/a), Company Registration Number: 17-09 -002808; represented by: Csepregi Ferenc manager, Data Protection Register Number: NAIH-89728/2015. e-mail address: [info@csepregi.hu](mailto:info@csepregi.hu) as Data Controller (hereinafter Data Controller) in accordance with Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter Info Act).

## 2. The scope of handled personal data:

Upon registration the User provides the following personal information:

user name,

e-mail address,

password,

billing address (company name, address, city, postal code), shipping address (shipping name, address, city, postal code), telephone number. Data technically recorded during the operation of the system: data generated by the User's computer while using the service, and which are collected by Data Controller's system as automatic results of technical processes. The system automatically logs these automatically collected data without any consent from User at User's every log in and log out. These data cannot be connected to personal data except when law requires it. These data are only available to Data Controller.

## 3. Cookie policy:

In order to provide a customised service Data Controller uses small pieces of data (cookies) and reads them back. If the browser sends back a previously saved cookie, the service provider using cookies can link the User's current visit with a previous one, but only in respect of its own content. Users can delete cookies from their own computers and they can

also block cookies in their browsers. User can make changes to the handling of cookies in the browsers' Tools/Settings menu under the Data Protection settings by clicking on cookies.

#### **4. Legal basis, purpose and means of data management:**

Data management is based on the Users' statement, which is voluntary after the Users were sufficiently informed. In the statement Users agree that all personal data, which they provide while using the site can be used. The legal basis of data management is the voluntary consent of the person concerned in accordance with point a) of subsection (1) of section 5 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act). Users approve of data management by using the website, by registering, and by providing their data on a voluntary basis. The aim of data management is to secure access to the provision of services on the websites. Data Controller stores data provided by the User for delivery and invoicing purposes, to fulfil the order, to inform the User, and also with the purpose of proving the conditions of a possible contract. Automatically recorded data is used to prepare statistics, to improve the IT infrastructure and to protect Users' rights.

Data Controller must not use the personal data provided for purposes other than those of its operation. Issuing personal data to a third party or to authorities can only be done with the prior and express consent of the User – unless otherwise provided for in the binding Law.

User providing personal data to the Data Controller is solely responsible for the validity of the information. By providing their email address it will be the Users' responsibility that they alone use the services with the provided email address. Due to this responsibility, any liability in connection with any purchase or communication via the provided email address shall rest with the User who provided his/her email address.

#### **Duration of data management:**

The management of personal data provided in the mandatory fields in the course of registration begins with registration and ends until they are deleted. Optional data will be handled from the date of disclosure until the specific data are deleted. Registration can be deleted any time by both User and Data Controller. Logging information is stored by the system within six months from the date of logging – with the exception of the date of last visit, which is automatically updated. The above mentioned provisions do not apply for the fulfilment of retention obligations defined in the law (e.g. tax legislation) and also for data managements, which are provided during registration on the website or based on other forms to provide further approvals.

#### **Persons entitled to access data, data forwarding, data processing:**

Data may be accessed primarily by Data Controller and its internal staff, however they do not have the right to publish them or hand them over to a third party. Data Controller employs external staff for the operation of the IT system, order fulfilment, and the settlement of accounts. Data Controller is not responsible for the external contributor's data management practices. Data Controller may forward and use the User's personal data only in cases specified by statute or if the User approves.

#### **User's rights and remedies:**

The User will have the right to obtain information from the Data Controller concerning their personal data managed by Data Controller. Also, User will have the option to delete them. Upon User's request Data Controller will provide information on the data managed by Data Controller related to the User, and also on the purpose, the legal basis and duration of data handling and on who receive or have received such data and for what purpose. Data Controller will provide the User with the requested information in writing within 30 days from the day the request is submitted. User may request the correction or deletion of their data if they have been recorded incorrectly. Certain data can be corrected by the User directly through the website. In all other cases Data Controller will delete the data within 3 business days from the day the request is requested but in the latter case it will not be possible to restore the deleted data. Data that must be retained by law (e.g. accounting rules) will not be deleted permanently, Data controller will retain them until requested.

In the event of a complaint in connection with the data handling practice of Data controller User may turn to court to enforce their rights under the Info Act and the Civil Code (Act 5 of 2013) but may also contact the Hungarian National Authority for Data Protection and Freedom of Information (NAIH). Upon registration to use the services if the User provides false information intentionally or the personal data of a third party or causes any damage while using the website, Data Controller is entitled to claim damages from the User. In such case Data Controller will provide the competent authorities with all reasonable assistance in order to identify the person violating the law.

#### **Use of e-mail addresses:**

Data Controller will pay special attention to the appropriate use of email addresses, which have been provided by the Users, therefore Data Controller shall use them only as described below: sending newsletters (leaflet or advertisement), emails. The e-mail address handling occurs primarily in order to identify Users, to fulfil orders, to allow communication with the User when using the service, which is the primary reason for sending any email. Data Controller shall send any advertising messages or other newsletters to the address provided by the User upon registration with the User's express consent, in compliance with the regulations.

#### **Miscellaneous provisions:**

The computer system of Data Controller may collect data about the User's activity, which cannot be linked with data provided by the User when registering, or with other data provided when using other websites or services. In case Data Controller intends to use the data provided by the User for purposes other than the purpose of original data recording, Data Controller shall notify the User thereof, and obtain their prior consent thereto, and afford an opportunity for them to cancel such consent at any time thereafter.

Data Controller undertakes to take care of the security of data and takes those technical measures, which ensure that the recorded, stored and managed data are protected and also it will make every effort to prevent the destruction, unauthorized use and unauthorized modification of data.

Data Controller reserves the right to unilaterally modify this Privacy Statement along with the prior notification of the User. After the modification takes effect, by using the service User will implicitly accept the modified Privacy Statement.

Tamási, 30 September, 2015.