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## PRIVACY NOTICE

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This Privacy Notice (hereinafter referred to as: “**Privacy Notice**”) describes the data processing on the a <https://euro-matic.eu> website (hereinafter referred to as: “**the Site**”) operated by **EURO-MATIC Kft.** (registered office: H-1224 Budapest, Máriás utca 30., company registration number: 01-09-194259, tax number: 25005758-2-43, represented by: Hermann László managing director individually, representative’s contact: z.hermann@euro-matic.eu, hereinafter referred to as: “**Data Controller**”) especially the characteristics of data collection, storage and use.

This Privacy Notice is effective from 1<sup>st</sup> of November 2020. The Data Controller keeps the current version of the Privacy Notice permanently available on the Site and at its registered office.

The Privacy Notice has been prepared in line with Regulation (EU) 2016/679 of the European Parliament and of the Council *on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* (hereinafter referred to as: “**GDPR**”), with due consideration of the provisions of Act CXII of 2011 *on Informational Self-determination and Freedom of Information* (hereinafter referred to as: “**Privacy Act**”). The definitions of this Privacy Notice are the same as the ones set out in Article 4 of the GDPR, also supplemented by certain points of the interpretative provisions mentioned in Section 3 of the Privacy Act. The provisions of GDPR, and where it is prohibited by the Privacy Act, alternatively, the provisions of Privacy Act shall be applicable in issues not regulated in this Privacy Notice.

Data Controller places special importance on the secure handling of personal data of their clients and visitors of the Site. Data Controller is entitled to prepare an extract from the content of this Privacy Notice in connection with each data processing, and may also ensure that the data subjects by signing this document declare that they have read and acknowledged the contents of the extract. Data Controller reserves the right to amend this Privacy Notice. If the amendment affects the use of personal data provided by the data subject, Data Controller shall inform the data subject of the changes in an appropriate form, such as an e-mail information letter. If the details of the data processing also change due to the amendment of the Privacy Notice, Data Controller will separately request the consent of the data subject.

Please read this Privacy Notice carefully and only engage the services available on the Site if you agree with the following.

### 1. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Data Controller – while providing its services – pays particular attention to personal data protection, complies with the mandatory legal provisions, and processes data in a secure and fair manner.

Data Controller processes personal data as set out in point 2 of this Privacy Notice. Data Controller shall treat the personal data disclosed to it confidentially, shall take into account the principles of legality, due process and transparency under the GDPR, and shall treat personal data purpose-bound, with the principle of data saving in mind. Data Controller shall also comply with the principle of limited storing, protect the confidentiality and integrity of personal data, and consider the principle of accuracy under the GDPR.



## 2. THE METHOD AND SECURITY OF DATA PROCESSING

Data Controller ensures the security of the data, and takes the necessary technical and organizational measures, also implements the procedural rules that are needed to enforce the provisions laid down in GDPR, the Privacy Act and the data and confidentiality rules provided in other legislation. Data Controller protects personal data from unauthorized access, modification, transmission, publication; unauthorized or accidental deletion and destruction; damages and also from becoming inaccessible as a result of changes in the technologies used.

Data Controller protects data files that are processed electronically in various registers, by ensuring that they are stored in different registers, and cannot be directly interconnected and associated with the Data Subject, unless it is permitted by law.

## 3. DATA PROCESSING IN RELATION TO THE SITE AND THE SERVICES OF THE DATA CONTROLLER

### 3.1. REQUEST FOR QUOTATION

Data Controller provides opportunity to request quotations after clicking on the "Request a quote" link on the Site, or within its webshop, after placing a certain number of products in the basket.

<b>Purpose of the processing</b>	Manage and answer quotation requests, send quotations.
<b>Categories of personal data concerned</b>	Data Subject's name, email address, phone number, indication of the products for which a quotation is requested, other additional information provided during the quotation.
<b>Data Subjects</b>	Persons requesting a quote using the Site, webshop.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR.
<b>Period of storage</b>	Until the Data Subject's consent is withdrawn.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject
<b>Automated decision-making and profiling</b>	The Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.



### 3.2. PERFORMANCE OF CONTRACTS

<b>Purpose of the processing</b>	Preparing, executing and performing contracts with sole proprietors, legal entities, or entities without legal personality.
<b>Categories of personal data concerned</b>	Contracting party's name, signature, bank account number, bank details, regarding sole proprietors their registration number, name, registered office, contact information and other possible data specified in the documents.
<b>Data Subjects</b>	Data Controller's contracting partners, customers.
<b>Legal basis for the processing</b>	The legal basis for data processing is Article 6 (1) (b) of the GDPR.
<b>Period of storage</b>	In principle, Data Controller processes personal data for 5 years from the termination of the contract, and for 8 + 1 years in case of accounting documents.
<b>Method of the processing</b>	On paper and/or electronic form.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.3. CONTACT PERSON'S DATA

Data Controller keeps a register of its contractual partners. In principle, Data Controller can process the personal data contained in the contracts only until the performance of the contract, in accordance with Article 6 (1) (b) of the GDPR.

Data Controller's contractual partners also include legal entities whose data in principle do not qualify as personal data, and Data Controller stores them for the purpose of the performance of the contract. However, the data of the contact person specified in the contract, as well as the data of the contact persons of various authorities who are not in a contractual relationship with Data Controller, are only the employees and subcontractors of Data Controller. Data Controller stores and registers the contact person's data based on the legitimate interest of Data Controller according to the interest balancing test performed, in order to facilitate the activities of Data Controller.



<b>Purpose of the processing</b>	The purpose of data processing is to register the contractual partners of Data Controller and their contact persons, and to register the contact persons of authorities.
<b>Categories of personal data concerned</b>	The contracting party's name, phone number, e-mail address, contact of the contact person (name, e-mail address, phone number)
<b>Data Subjects</b>	Data Controller's contractual partners, customers and their contact person
<b>Legal basis for the processing</b>	With regard to the contracting party, corresponding to Article 6 (1) (b) of the GDPR, the execution and performance of the contract; with regard to the contact person of the contracting party, the legitimate interest of Data Controller pursuant to Article 6 (1) (f) of the GDPR.
<b>Period of storage</b>	For 5 years after the performance of the contract.
<b>Method of the processing</b>	On paper and/or electronic form.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	If the Data Subject does not provide the data, Data Controller will not be able to perform the contract, and to contact the contractual partners, customers.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.4. ISSUING ACCOUNTING DOCUMENTS

Issuing an accounting document is necessary due to Data Controller's economic activity. Given that Data Controller may also contract with sole proprietors in addition to legal entities or entities without legal personality, and that certain data of sole proprietors may be considered personal data, it is necessary for Data Controller to have personal data processed in connection with the management of accounting documents.

<b>Purpose of the processing</b>	Issuance, storage and accounting of invoices.
<b>Categories of personal data concerned</b>	Data specified in Act C of 2000 on accounting and Act CXXVII of 2007 on the value-added tax, especially the Data Subject's name, date and period of the transaction, address, e-mail address and telephone number.
<b>Data Subjects</b>	Data Controller's contracting partners.
<b>Legal basis for the processing</b>	Processing activities are based on Article 6 (1) (c) of the GDPR and Section 167 and Section 159 Paragraph (1) of Act C of 2000 on accounting.



<b>Period of storage</b>	According to Section 169 Paragraph 2 of the Act C of 2000 on accounting Data Controllers must store accounting documents for 8 years. After 8+1 years Data Controller automatically deletes the personal data of the Data Subject.
<b>Method of the processing</b>	On paper and/or electronic form.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing Data Controller with the data is a legal obligation, therefore it is mandatory.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.5. DATA PROCESSING RELATING TO THE WEBSHOP

#### 3.5.1. REGISTRATION

Visitors to the Site have the opportunity to register in the Data Controller's webshop. It is important that the registration and creation of a customer account are not a prerequisite for shopping in the webshop. If the visitor wants to register in the webshop, he/she can do so by filling out the registration interface. In order to finalize the registration, it is necessary to give your consent to the data processing by selecting the checkbox, as well as to accept the Privacy Notice of the Data Controller, without which the registration will not be finalized.

More detailed information on registration can be found in the Data Controller's General terms and Conditions, which is available at the following link: <https://euro-matic.eu/hu/en/gtc/>

<b>Purpose of the processing</b>	Contacting the Data Controller, registration.
<b>Categories of personal data concerned</b>	Data Subject's e-mail address, password.
<b>Data Subjects</b>	Persons who registered.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR.
<b>Period of storage</b>	Until the Data Subject's consent is withdrawn.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing data is voluntary, if the Data Subject does not provide the data to the Data Controller, the Data Subject cannot register in the Data Controller's webshop.



<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.5.2. CREATING AND MAINTAINING A CUSTOMER ACCOUNT

If the Data Subject registers in the Data Controller's webshop, after registration, by pressing the "Login" button, he/she has the opportunity to log in to his/her own personal account. More detailed information on editing, modifying and deleting the customer account can be found in the Data Controller's General Terms and Conditions, which is available at the following link: <https://euro-matic.eu/hu/en/gtc/>

<b>Purpose of the processing</b>	Processing and storage of data related to customer accounts created by persons registering in the Data Controller's webshop.
<b>Categories of personal data concerned</b>	Customer account information such as the Data Subject's e-mail address, password, name, shipping and billing address, previous order details, possibly phone number
<b>Data Subjects</b>	Persons who created customer accounts.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR.
<b>Period of storage</b>	Until the Data Subject's consent is withdrawn.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing data is voluntary, if the Data Subject does not provide the data to the Data Controller, the Data Subject cannot create a customer account in the Data Controller's webshop.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.5.3. PROCESSING CUSTOMER'S DATA

If a visitor to the Site wishes to make a purchase in the Data Collector's webshop, he/she may make a purchase as a registered customer or without registration. It is important that before ordering the selected product, i.e. before concluding the contract between the customer and the Data Controller, it is necessary for the customer to provide certain data in order to deliver and invoice the ordered product. We would like to highlight that the registration is not a prerequisite for making a purchase in the webshop, those who are interested can purchase without registration. The delivery address is handed over to the courier who qualifies as a data processor.



The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice. The telephone number is required for the receipt. The e-mail address is required for online contact. Delivery details are required to enable the courier to deliver the ordered product to the address requested by the Data Subject. Billing information is required for invoicing.

It is important that in the case of payment by credit card, the customer is redirected to the UniCredit Bank website and the customer can fulfill his payment obligation through this page. Data Controller does not handle any data related to the bank card.

<b>Purpose of the processing</b>	Purchases, orders, invoices, fulfillment of accounting obligations, registration of customers, fulfillment of orders, handling of customer feedback, purchases through the Site.
<b>Categories of personal data concerned</b>	Data Subject's name, e-mail address, delivery and billing details, date of purchase, name, quantity and purchase price of the ordered product, bank account number of the person who is paying, payment identifier, message to payee and in case of exercising the right of cancellation data concerning the cancellation.
<b>Data Subjects</b>	Persons purchasing in the Data Controller's webshop.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR and subject to Section 169 Subsection (2) of Act C of 2000 on <i>accounting</i> fulfillment of a legal obligation under Article 6 (1) (c) of the GDPR, and regarding the contract between the Data Controllers and Data Subject performance of the contract under Article (6) (1) (b) of the GDPR.
<b>Period of storage</b>	Data Controller stores the personal data processed on the basis of the Data Subject's consent until the Data Subject's consent is withdrawn, while Data Controller is obliged to store the personal data processed in connection with Section 169 Subsection (2) of Act C of 2000 on <i>accounting</i> for 8 years, thus Data Controller will automatically delete them after 8+1 years or after the expiry of the limitation period according to the Civil Code of Hungary.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing certain personal data is required by the law and providing certain personal data is necessary for the performance of the contract. If the Data Subject does not provide the data to the Data Controller, Data Controller will not be able to perform the contract.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.



<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.
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### 3.6. CONTACT

Data Controller provides an opportunity for its customers and visitors to the Site to contact the Data Controller via one of the contact details provided on the Site or through the Contact menu.

<b>Purpose of the processing</b>	Contact with the customers
<b>Categories of personal data concerned</b>	Data Subject's name, email address, possibly phone number, possibly the message itself and its subject.
<b>Data Subjects</b>	Person contacting the Data Controller
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR.
<b>Period of storage</b>	Until the purpose of the processing is reached, until the erasure at request of the Data Subject at most.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	If the Data Subject does not provide the data, Data Controller will not be able to contact him/her.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.7. GUARANTEE CLAIM

Data Controller provides an opportunity for its customers and visitors of the Site to enforce their guarantee claims in connection with the purchased products.

<b>Purpose of the processing</b>	Data processing relating to enforcing guarantee claims.
<b>Categories of personal data concerned</b>	The identification of the order, Data Subject's name, e-mail address, telephone number, address, the exact name of the purchased product and the description of the defect, as well as the claim to be enforced and possible pictures sent (about the product, defect).
<b>Data Subjects</b>	Person enforcing a guarantee claim.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR, and subject to Decree No. 19/2014. (IV.





	29.) NGM of the Minister for National Economy and Civil Code of Hungary fulfillment of a legal obligation under Article 6 (1) (c) of the GDPR
<b>Period of storage</b>	The report of the complaint is kept by the Data Controller for 3 years from the date of its recording.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing data is mandatory by law in order for the Data Subject to be able to enforce his/her guarantee claim.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.8. HANDLING COMPLAINTS

Those clients of the Data Controller who qualify as consumers are entitled to the right to complain according to Act CLV of 1997 on *consumer protection* (hereinafter referred to as: “Consumer Protection Act”). Pursuant to Consumer Protection Act consumer (Data Subject) is entitled to submit a complaint to the Data Controller at the e-mail address [shop@euro-matic.eu](mailto:shop@euro-matic.eu) as well as orally and in writing in a letter sent to Data Controller’s registered office. Complaints received by the Data Controller shall be handled by the Data Controller in accordance with the provisions of the Consumer Protection Act and the consumer shall be informed of the result of the investigation of the complaint within the specified deadline. If the undertakings (businesses) (hereinafter referred to as: “undertakings”) in accordance with Point a) Section 2 of Consumer Protection Act have a complaint, in order to settle the consumer dispute out of court, the undertakings may initiate proceedings before the conciliation board having territorial competence over the seat of the undertaking or a conciliation board operating under the professional chamber that has territorial competence over the seat of the Data Controller's, and the undertakings are also entitled to enforce consumer dispute claims in court.

<b>Purpose of the processing</b>	Receiving, investigating and resolve complaints.
<b>Categories of personal data concerned</b>	Data Subject’s name, address, e-mail address, data relating to the complaint under Section 17/A Subsection (5) of Consumer Protection Act, and in case of undertakings the data concerning the enforcement of claims.
<b>Data Subjects</b>	Person submitting the complaint and in case of undertakings their representatives.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject’s consent under Article 6 (1) (a) of the GDPR, and subject to Consumer Protection Act fulfillment of a legal obligation under Article 6 (1) (c) of the GDPR



<b>Period of storage</b>	If, after the response has been sent, the Data Subject has not raised any further objections, then under Section 17/A Subsection (7) of the Consumer Protection Act Data Controller deletes the data after 5 years from sending out the response; in case of further enforcement of claims the data is deleted after the expiry of the limitation period, or in case of a possible civil law claim, after the final judgement has been delivered.
<b>Method of the processing</b>	On paper and/or electronic form.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing data is mandatory by law if the Data Subject does not provide the data, Data Controller will not be able to examine the complaints.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible legal representatives of Data Controller.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.9. NEWSLETTER

Data Controller provides an opportunity for newsletter subscribers to receive various additional information about Data Controller's services at regular intervals through newsletters.

<b>Purpose of the processing</b>	To inform newsletter subscribers.
<b>Categories of personal data concerned</b>	Name and e-mail address of the newsletter subscriber.
<b>Data Subjects</b>	Persons subscribing to newsletters.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR.
<b>Period of storage</b>	Until the Data Subject's consent is withdrawn.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	If Data Subject does not provide the data, then Data Collector cannot send him/her newsletters.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.



### 3.10. DIRECT MARKETING

Visitors of the Site and persons with a customer account, by giving their consent, can indicate to Data Controller that they would like to receive direct marketing inquiries from Data Controller either by post, e-mail or telephone (SMS).

<b>Purpose of the processing</b>	Data processing, sending invitations, information for the purpose of direct marketing inquiries.
<b>Categories of personal data concerned</b>	Name, e-mail address, phone number, address of the person allowing the direct marketing inquiries.
<b>Data Subjects</b>	Person allowing the direct marketing inquiries.
<b>Legal basis for the processing</b>	The legal basis for data processing is the Data Subject's consent under Article 6 (1) (a) of the GDPR.
<b>Period of storage</b>	Until the Data Subject's consent is withdrawn.
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Possible consequence of failure to provide data</b>	Providing data is voluntary, if the Data Subject does not give his/her consent to the direct marketing inquiry, Data Controller will not seek him/her for this purpose.
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.11. RECORD-KEEPING RELATING TO THE EXERCISE OF RIGHTS OF THE DATA SUBJECTS

<b>Purpose of the processing</b>	Processing regarding the record-keeping relating to the exercise of rights of the Data Subjects under the GDPR.
<b>Categories of personal data concerned</b>	Applicant's name, place and date of birth, mother's maiden name, address, mailing address, request for the exercise of a data subject's right under the GDPR.
<b>Data Subjects</b>	Data Subjects exercising their rights under the GDPR.
<b>Legal basis for the processing</b>	Legal obligation based on Article 6 (1) (c) of the GDPR and the Data Controller's legitimate interest based on Article 6 (1) (f) of the GDPR.
<b>Period of storage</b>	5 years from the assessment of the application.
<b>Method of the processing</b>	On paper and/or electronic form.
<b>Source of the personal data</b>	Data collected from the Data Subject.



<b>Possible consequence of failure to provide data</b>	If the Data Subject does not provide the data, Data Controller will not be able to meet the requirements of the GDPR
<b>Automated decision-making and profiling</b>	Data Controller does not use automated decision-making and does not perform profiling.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	There is no data transfer to third countries or international organisations.

### 3.12. FACEBOOK

Data Controller operates a Facebook page on the website <https://www.facebook.com/>, which is available at the following link: <https://www.facebook.com/euromaticballs/>. On this Facebook page Data Controller shares information and images relating to Data Controller's professional portfolio, services, products and publishes videos. Visitors to the Facebook page can express their opinions about the products and services of the Data Controller. Data Controller collects data and analyses the activity of visitors on the Facebook page with the Site Analysis function.

With respect to personal data collected during Facebook Analytics, Data Controller and Facebook Ireland Ltd. are considered joint controllers under Article 26 of the GDPR, as Data Controller and Facebook Ireland Ltd. jointly define the purposes and means of data processing. Facebook Ireland Ltd. assumes primary responsibility for the processing of analytical data under the GDPR.

If Data Subjects exercise their rights against the Data Controller in relation to the processing of analytical data, or if the Supervisory Authority contacts the Data Controller in relation to the processing of analytical data, the Data Controller shall forward such requests to Facebook Ireland Ltd. without delay, but no later than 7 calendar days. Data Controller will not act or respond on behalf of Facebook Ireland Ltd.

Data Controller shall ensure that it has an appropriate legal basis for the processing of analytical data in accordance with the GDPR. Data Controller does not request specific personal data processed by Facebook Ireland Ltd. during the Analytics, the Data Controller sees only the statistics and reports prepared by Facebook Ireland Ltd., not the personal data on which they are based.

Further information on the joint data management agreement between the Data Controller and Facebook Ireland Ltd. for the Facebook page can be found at:

[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)

<b>Purpose of the processing</b>	Data processing relating to the use of the Facebook page.
<b>Categories of personal data concerned</b>	In principle, Data Controller only handles statistical data, such as the number of people who liked the page, the number of new likes, the number of people who have read, liked, commented on or shared the post, and the number of who marked it as spam; in terms of visits to the



	Facebook page, the number of times the page was viewed, the number of times they came to the Facebook page from an external page, the number of times the video was viewed, the most viewed videos in relation to the videos posted on the Facebook page. Regarding the people who liked the Facebook page it also processes age, gender, and location as statistical data.
<b>Data Subjects</b>	Visitors of the Facebook page.
<b>Legal basis for the processing</b>	Processing activities are based on the Data Subject's consent under Article 6 (1) (a) of the GDPR
<b>Period of storage</b>	Until the withdrawal of the Data Subject's consent
<b>Method of the processing</b>	Electronic.
<b>Source of the personal data</b>	Data collected from the Data Subject.
<b>Who has access to the personal data?</b>	Responsible employees and possible data processors of Data Controller. The current list of data processors of Data Controller is listed in Section 4 of this Privacy Notice.
<b>Data transfer to third countries or international organisations</b>	Data is transferred to Facebook Ireland Ltd.

### 3.13. COOKIES

A cookie is a file containing various letters and numbers sent by a webserver and recorded and stored for a pre-determined period on the user's (Data Subject's) computer. Some cookies are essential to the proper functioning of the site, others collect statistics to make the site more convenient to use, while there are cookies designed to place targeted ads.

The detailed information of the cookies is specified in the Data Controller's Cookie Policy, which is accessible by this link: <https://euro-matic.eu/hu/en/cookie-policy/>

## 4. DATA PROCESSORS

The data processors do not make decisions independently, they shall act in compliance with the contract concluded with the Data Controller and with the instructions received from the Data Controller. Data processors record, manage and process the personal data transmitted to them by the Data Controller in accordance with the provisions of GDPR. Data processors can access, and process personal data provided by the Data Subjects during the period specified in the Privacy Notice regarding the individual purposes of data processing. Data Controller transmits data to the following data processing companies regarding the data processing mentioned in this Privacy Notice:

- Tárhely.Eu Szolgáltató Kft.. (registered office: 1144 Budapest, Ormánság u. 4., Company registration No.: 01-09-909968, Tax No.: 14571332-2-42, purpose of the data processing: hosting services)



- GLS General Logistics Systems Hungary Kft. (registered office: 2351 Alsónémedi, GLS Európa utca 2, Company registration No.: 13-09-111755, Tax No.: 12369410-2-44, purpose of the data processing: delivery of ordered products)
- MiniCRM Zrt. (registered office: 1075 Budapest, Madách Imre út 13-14., Company registration No.: 01-10-047449, Tax No.: 23982273-2-42, purpose of the data processing: sending newsletters)
- Kulcs-Soft Nyrt. (registered office: 1016 Budapest, Mészáros u. 13., Company registration No.: 01-10-045531, Tax No.: 13812203-2-41, represented by: Kulcsár Tibor member of the board individually, purpose of the data processing: billing software)

## 5. RIGHTS OF THE DATA SUBJECTS

Data Subject is entitled to exercise the following rights by sending a request to the Data Controller's e-mail address ([info@euro-matic.eu](mailto:info@euro-matic.eu)):

- right to information and access
- right to rectification
- right to erasure ('right to be forgotten')
- right to restriction of processing
- right to object and automated individual decision making
- right to data portability
- right to withdraw consent

In case of execution of the Data Subject's request, Data Controller identifies the Data Subject in accordance with this Privacy Notice, and Data Controller complies with the Data Subject's request only after the identification has been conducted.

If the Data Subject's request was not prepared in accordance with this Privacy Notice and Data Controller has not been able to identify the Data Subject, Data Controller notifies the applicant of the deficiencies, which if the Data Subject fails to comply with, Data Controller will be unable respond to the request.

The time elapsed between the request to provide the necessary personal data/carry out the missing activity requested by the Data Controller to the provision of the personal data, does not count towards the deadline for responding to the request.

Data Controller informs all recipients of any rectification, erasure or restriction of processing with whom personal data have been shared with, unless this proves to be impossible or involves a disproportionate effort. Upon request, Data Controller informs the Data Subject of these recipients.

### 5.1. RIGHT TO INFORMATION AND ACCESS

According to Article 13 of GDPR the Data Controller - in case personal data relating to a data subject are collected from the data subject - shall, at the time when personal data are obtained, provide the Data Subject with all of the following information:



- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the planned period for which the personal data will be stored or if not possible, the criteria used to determine that period;
- e) right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning the Data Subject or to object to such processing;
- f) the right to file a complaint with the Hungarian Authority for Data Protection and Freedom of Information (NAIH);
- g) the right to seek judicial remedies;
- h) if the personal data are not collected from the Data Subject, any available information regarding their source;
- i) the existence of automated decision-making, including profiling, the significance and the planned consequences of such processing for the Data Subject;
- j) appropriate measures taken in case data are transferred to third countries or international organizations Data Subject has the right to obtain a copy of the personal data undergoing such processing.

Data Controller shall provide information on what action he took upon a request from the Data Subject within one month from the date of receipt.

Data Controller may charge a reasonable fee based on administrative costs according to Article 12 of GDPR.

## **5.2. RIGHT TO RECTIFICATION**

Data Subject has the right to obtain from Data Controller the rectification of inaccurate personal data concerning him or her, without undue delay. Taking into account the purpose of the processing, the Data Subject has the right to request the completion of his or her incomplete data, even by means of a supplementary declaration.

## **5.3. RIGHT TO ERASURE ('RIGHT TO BE FORGOTTEN')**

Data Subject has the right to request from the Data Controller the erasure of the Data Subject's personal data and the Data Controller is obliged to erase such personal data, without undue delay. In such cases Data Controller will not be able to further provide the Data Subject with the services of the Data Controller. Data Subject has the right to request erasure if one of the following applies:

- a) the personal data is no longer necessary for the purpose that the Data Controller collected it for;
- b) Data Subject withdrew his or her consent to the processing activities and there is no other legal basis for processing applies;
- c) the Data Subject objects to the processing pursuant to Section (1) of Article 21 of GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Section (2) of Article 21 of GDPR;
- d) his or her personal data is being unlawfully processed;



- e) EU or member state law oblige the Data Controller to erase Data Subject's personal data to comply with a legal obligation;  
OR
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8 of GDPR.

#### **5.4. RIGHT TO RESTRICTION OF PROCESSING**

Data Subject may have the right to request from Data Controller the restriction of processing his or her personal data if one of the following grounds applies:

- a) Data Subject contest the accuracy of the personal data Data Controller process about the Data Subject. Data Controller must restrict processing the contested data until they can verify the accuracy of Data Subject's personal data.
- b) Data Controller are unlawfully processing the Data Subject's personal data.
- c) Data Controller no longer need to process the Data Subject's personal data but the Data Subject need the personal data for the establishment, exercise or defense of legal claims.
- d) The Data Subject has objected to processing pursuant to Article 21 of GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

In case of the restriction is justified, personal data shall, with the exception of storage, only be processed

- if the Data Subject consented to it;
- for the establishment, exercise or defense of legal claims;
- for the protection of the rights of another natural or legal person, or
- for reasons of important public interest of the Union or of a Member State.

If the processing of the Data Subject's personal data has been restricted, Data Subject will be informed before the restriction of processing is lifted.

#### **5.5. RIGHT TO OBJECT AND AUTOMATED INDIVIDUAL DECISION MAKING**

The Data Subject shall have the right to object, if processing his or her data is based on:

- the public interest or in the exercise of official authority vested in Data Controller according to point (e) of Section (1) of Article 6;
- purposes of the legitimate interests pursued by Data Controller or by a third party according to point (f) of Section (1) of Article 6.

The Data Controller shall no longer process the personal data unless there is compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.





## 5.6. RIGHT TO DATA PORTABILITY

The Data Subject shall have the right to receive the personal data concerning him or her, which he or she provided to Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without obstruction from the Data Controller, where:

- a) the processing is based on the Data Subject's consent or the processing is necessary for the Data Controller to perform a contract with the Data Subject; and
- b) the processing is carried out by automated means.

## 5.7. RIGHT TO WITHDRAW CONSENT

Where processing is based on consent, the Data Subject shall have the right to withdraw his or her consent at any time. Regarding this, the Data Controller informs the Data Subject that they may continue to process the Data Subject's personal data for the purpose of fulfilling his legal obligation or validating his legitimate interests even after the consent is given by the Data Subject has been withdrawn, if the enforcement of the interest is proportionate to the restriction of the right to the protection of personal data.

## 6. LEGAL REMEDIES

Data Controller shall reimburse the damage caused to others by the unlawful processing of the Data Subject's data or the violation of the data security requirements, Data Controller shall also reimburse the grievance award for the infringements of personality rights caused by the Data Controller or the data processor. Data Controller shall be exempted from liability for the damage caused and from the obligation to pay grievance award if Data Controller proves that Data Controller is not liable in any way for the event giving rise to the damage.

If the Data Subject feels that the processing of his/her personal data have breached the provisions of GDPR, the Data Subject is entitled to contact the Data Controller directly at the following e-mail address: [info@euro-matic.eu](mailto:info@euro-matic.eu) in order to eliminate the violation against him/her. The Data Subject is also entitled to file a complaint with the Hungarian Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság; "NAIH", H-1055, Hungary, Budapest, Falk Miksa utca 9-11; postal address: H-1363 Budapest, Pf. 9. phone: +36-1 391-1400; fax: +36-1 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). The Data Subject to protect his/her data has the right to initiate proceedings before the court, which proceeds under priority. The Data Subjects can choose whether the action shall be brought before the district court in whose area of competence the Data Subject's place of residence is located or before the district court in whose area of competence the Data Subject's habitual residence is located (<http://birosag.hu/torvenyszekek>). The competent district court can be found on this site: <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>