

PRIVACY POLICY

Privacy Policy

NATURHUN Korlátolt Felelősségű Társaság

(last modified on: 17 July 2018)

Under regulation 2016/679 of the European Parliament and of The Council (“**GDPR**”), NATURHUN Korlátolt Felelősségű Társaság (registered seat: 2053 Herceghalom, Gesztenyés út 11.; company registration number: 13-09-097886; tax number: 13221388-2-13) as data controller (hereinafter referred to as “**Service Provider**” or “**Data Controller**”) hereby notifies all persons visiting, or sending message, or making an offering, or requesting offer through its website, as well as subscribing to its newsletter (hereinafter referred to as “**Data Subject**”, “**User**”, “**You**” or “**Visitor**”) on the personal data which are being processed by it, its practice followed when processing personal data, furthermore on the means and opportunities through which Data Subjects can exercise their rights.

The websites available under the domain names of <https://naturhun.hu/>, <https://naturhun.de/>, <https://naturhun.co.uk/>, <https://naturhun.fr/>, <https://naturhun.eu/es/>, <https://naturhun.eu/>, and <https://naturhun.com/> (hereinafter referred to as “**Website**”) are the Data Controller’s own websites.

The Data Controller acknowledges to be legally bound by the content of the present legal notice relating to the processing of personal data carried out within the framework of its business activities. The Data Controller reserves the right to modify the present Privacy Notice (hereinafter referred to as “**Notice**”). The Data Controller publishes the current version of the Notice on its Website, the amendments of the Notice come into effect with the publication.

The Data Controller shall keep confidential and secure all personal data and shall carry out all the necessary developments and modifications, depending on changes in the legal and technical framework.

We ask you to read the notice carefully before using the Website. The consent to each processing of personal data shall be given by the User at the same time of using the Website, or by sending message or making an offering through it, or registering to the newsletter.

I. DEFINITIONS

„**Personal data**”: means 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;

„**Processing**”: means 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;

“**Controller**”: means 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;

„**Data transfer**”: means ensuring access to the data for a third party;

„**User**”: any visitor of the Website; any person enjoying the status of consumer who registers, places an order and has a user’s account;

“**Consent**”: means 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;

„**Data process**”: means performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data;

„**Processor**”: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

„**Personal data breach**”: means 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;

“**Profiling**”: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability behaviour, location or movements;

„**Service**”: all the services provided by the Web Shop available on the Website, such as the delivery of flowers, delicacies, soaps, silk flowers, home fragrance diffusers, home decoration articles and other products against purchase order, as well as other services available on the Website, such as the execution of workshops.

“**Third party**”: means 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;

II. DATA CONTROLLER’S MAIN DATA AND CONTACT DATA

Company name: NATURHUN Korlátolt Felelősségű Társaság

Registered Seat: H-2053 Herceghalom, Gesztenyés út 11.

Company registration number: 13-09-097886

Tax number: 13221388-2-13

E-mail: naturhun@naturhun.hu

III. PRINCIPLES AND MEANS OF DATA PROCESSING

Data Controller shall record and process personal data lawfully, fairly and in a transparent manner in relation to the User.

The Data Controller shall process personal data only for specified, explicit and legitimate purposes.

The Data Controller shall store the personal data provided by the User for specified purposes.

Personal data processed by the Data Controller shall be adequate, relevant and limited to what is necessary regarding the extent and duration of the processing.

The data controller shall plan and execute its data management processes so as to guarantee the protection of the Data Subject’s privacy.

The Data Controller shall ensure the security of data (by password, virus protection software, two-step identification) and take all the technical and organisational measures and develop procedures that are necessary for implementing the provisions of the Info Act and the other relevant data protection and confidentiality regulations.

The data controller protects personal data by adequate action particularly against:

- unauthorised access,
- modification,
- transmission,
- disclosure,
- deletion or destruction,
- incidental destruction or damage,
- data becoming inaccessible as a result of changes in the technology used.

In order to prevent unauthorised access, modification or unauthorised disclosure or use of personal data, the data controller shall arrange for:

- installing and operating an adequate information technology and technical environment,
- carefully selecting and supervising its employees involved in the provision of services.

On the basis of the above, the service provider shall make sure that the information managed by it

- be available to those authorised,
- its authenticity and authentication be secured, and
- its integrity can be verified.

The information systems of the data controller and its storage provider shall protect the data *inter alia* against:

- computer frauds,
- spying,
- computer viruses,
- spamming,
- hacking
- and other attacks.

Information regarding any data processing which is not mentioned in the present Notice shall be provided by the Data Controller when recording the respective data.

Processing of automatically recorded data serve the following purposes: compilation of statistics, technical development of the Website, protection of the User's rights. Statistical accounts shall not include, in any form, other data which can be used to identify the User, thus it shall be considered neither as processing nor as transmission of data.

The Service Provider does not verify personal data disclosed to it. Any person disclosing data shall exclusively be liable for the correctness of the data disclosed. Should the data provider not provide its own personal data, the data provider shall be obliged to obtain the User's consent.

Only persons of legal capacity aged 18 or more allowed to send message, make offering through the Website, or register to the newsletter. The User shall be liable for the compliance of its activities with the present Notice. The Service Provider shall take all necessary steps in order to filter out any processing of personal data of persons below the age of 18 years.

The Data Controller shall not use the personal data disclosed for purposes other than specified in the present Notice, and neither shall it be entitled to do so. The Data Controller shall not disclose

personal data, which are being processed by it, to third persons other than the Data Processors specified in the present Notice.

Unless provided otherwise mandatorily by an Act, personal data may be disclosed to third persons or authorities with the User's previous and express consent. In cases where the Data Controller intends to use any personal data for purposes other than that of the original recording of data, it shall inform the User about that intent and obtain his or her previous and express consent, as well as it shall provide opportunity for the User to prohibit the use.

The Data Controller shall be obliged, upon any authority's exceptional request or the request of other entities authorised by law, to provide information, to disclose or transmit data, as well as to hand over documents. In such cases – if the requesting authority or entity has indicated the specific purpose and the scope of data – the Data Controller shall disclose personal data only if and to the extent that it is necessary to fulfil the purpose of the request.

Should the User have any questions or problems when using the Data Controller's services, he or she may contact the Data Controller by using the contact data included in this Notice, or available on the Website.

IV. SCOPE OF DATA PROCESSING

➤ MAKING AN OFFERING

Through the Hungarian language Website (<https://naturhun.hu/>), hunting organisations can offer game for hunting.

Scope and purpose of processing:

Personal data	Purpose of processing
Administrator's name, telephone number, email address	Liaising, identification
Date of sending message	Execution of a technical transaction
IP address at the time of sending the message	Execution of a technical transaction

Users concerned: all Data Subjects who send a message or make an offer through the website.

Period for which personal data are processed, time limit for erasure: until managing the issue, or until the User's request for erasure.

Potential recipients of personal data entitled to access to personal data: personal data may be processed by the Data Controller's employees authorised thereto, in accordance with the content of the present Notice.

Legal basis of processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

We hereby inform you that:

- processing of personal data is based on your freely given consent;
- provision of your personal data is necessary for making an offering,
- if you do not provide such data, the offering cannot be made.

➤ **REGISTRATION / OFFER REQUEST FORM**

Through the German, English, French, Spanish and Italian Websites (<https://naturhun.de/>, <https://naturhun.co.uk/>, <https://naturhun.fr/>, <https://naturhun.eu/es/>, <https://naturhun.eu/>), interested people can register / request offer for hunting.

Scope and purpose of processing:

Personal data	Purpose of processing
Family name, first name	Liaising, identification
Telephone number, fax number, e-mail address	Liaising
Address	It is necessary for giving an accurate offer
Any personal data eventually included in the request for offer	It is necessary for giving an accurate offer
Date of sending message	Execution of a technical transaction
IP address at the time of sending the message	Execution of a technical transaction

Users concerned: all Data Subjects who register / request offer through the Website.

Period for which personal data are processed, time limit for erasure: until managing the issue, or until the User's request for erasure.

Potential recipients of personal data entitled to access to personal data: personal data may be processed by the Data Controller's employees authorised thereto, in accordance with the content of the present Notice.

Legal basis of processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

We hereby inform you that:

- processing of personal data is based on your freely given consent;
- provision of your personal data is necessary for registering / requesting offer,
- if you do not provide such data, the registering / requesting offer cannot take place.

➤ **SENDING MESSAGE THROUGH THE WEBSITE, CORRESPONDENCE**

Should you have any question regarding our services, you can contact the Data Controller by using the contact data included in this Notice or available on the Website, or by using the contact form in the menu under "Contact".

Terms and conditions of using the contact form on the Website:

Scope and purpose of processing:

Personal data	Purpose of processing
Name, email address	Liaising, identification

Date of sending message	Execution of a technical transaction
IP address at the time of sending the message	Execution of a technical transaction

Users concerned: all Data Subjects who send message through the Website.

Period for which personal data are processed, time limit for erasure: until managing the issue, or until the User's request for erasure.

Potential recipients of personal data entitled to access to personal data: personal data may be processed by the Data Controller's employees authorised thereto, in accordance with the content of the present Notice.

Legal basis of processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

We hereby inform you that:

- processing of personal data is based on your freely given consent;
- provision of your personal data is necessary for sending message through the Website,
- if you do not provide such data, sending message through the Website cannot take place.

➤ NEWSLETTER

The Data Controller enables the Users to subscribe to a newsletter on the Website. Observing the provisions of the present Notice, the User can thereby give consent to receive offers, promotional material and other messages (newsletter) from the Data Controller at the contact data disclosed when registering, as well as to the processing of his or her personal data necessary for sending advertising materials.

The Data Controller shall not send unsolicited advertising messages.

Scope and purpose of processing:

Personal data	Purpose of processing
Name, email address	Identifying the User, sending newsletter (electronic messages with promotional content, providing information about the Service Provider's or its partner's current news, products, campaigns, new functions, etc.)
Date of subscribing	Execution of a technical transaction
IP address at the time of subscribing	Execution of a technical transaction

Users concerned: all Users who subscribe to the newsletter.

Period for which personal data are processed, time limit for erasure: in case of newsletters, the Data Controller shall process the personal data disclosed by the User when subscribing to the newsletter until the User unsubscribes from the newsletter by clicking on the "Unsubscribe" button available in the newsletter message, or requests by mail or by e-mail to be deleted from the subscribers' list. In case of unsubscribing, the Data Controller shall not send any more newsletter

or offer to the User. The User can withdraw his or her consent and unsubscribe from the newsletter for free, at any time, without any restriction or obligation to give reason, and can request deletion from the list of subscribers. The Data Controller informs the User in electronic form about unsubscribing and deleting the User from the list of subscribers.

Potential recipients of personal data entitled to access to personal data: personal data may be processed by the Data Controller’s employees authorised thereto, in accordance with the content of the present Notice.

Legal basis of processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

We hereby inform you that:

- processing of personal data is based on your freely given consent;
- provision of your personal data is necessary for subscribing to the newsletter,
- if you do not provide such data, you cannot subscribe to the newsletter.

➤ **SOCIAL MEDIA**

The Data Controller informs the User that it also receives personal data through the social media websites.

Scope and purpose of processing:

Personal data	Purpose of processing
The registered name and public profile photo of users of the social media sites Facebook / Google+ / Twitter / Pinterest / Youtube / Instagram etc.	To collect data about sharing, likes and promotion on social media sites of certain content, products or campaigns on the Website or of the Website itself.

Users concerned: all data subjects who registered at a social media site and ‘liked’ the Website.

Period for which personal data are processed, time limit for erasure, potential recipients of personal data entitled to access to personal data, rights of the data subject related to the processing: the data subject may get information about the source of personal data, their management, the method and legal basis of disclosure on the relevant social media site. The data management is done on the social media site, therefore the duration and method of data management and the opportunity to request deletion or modification of users’ data are governed by the regulations of the relevant social media site.

Legal basis of processing: consent freely given by the User [Art. 6 (1) (a) of GDPR] on the relevant social media site.

V. PROCESSING OF TECHNICAL DATA AND COOKIES

➤ **PROCESSING OF COOKIES**

1. The fact of data management and the scope of data being managed: Unique ID numbers, dates, times.
2. Data subjects concerned: all data subjects visiting the Website.
3. The purpose of data processing: to identify users and keep track of visitors.

4. Duration of data management, deadline for deleting personal data: the duration of data management lasts until the visit to the Website ends in case of session cookies, and for a maximum period of 60 days in other cases.
5. The identity of the data controllers authorized to access the information: the Data Controller is not deemed to manage personal data by using cookies.
6. Description of the rights and remedies of the data subjects relating to data management: the data subjects may delete cookies in the Tools/Settings menu item of their browser, usually under the heading Data Protection.
7. The legal basis of data management: No consent is required from the data subject if cookies are used exclusively for transmitting information through the electronic communications network or if it is absolutely necessary for the service provider to be able to provide information society related services expressly requested by the subscriber or user.

➤ **GOOGLE ADWORDS CONVERSION TRACKING**

1. The data controller uses Google AdWords including Google's conversion tracking service integrated in it. Google conversion tracking is an analysis tool of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; „Google“).
2. Whenever a user visits a website through a Google advertisement, a cookie will be saved to their computer for the purpose of conversion tracking. These cookies have a limited validity, and they do not contain any personal data, thus the User cannot be identified from them.
3. When the User is browsing a certain page of a website, and the cookie has not expired yet then both Google and the data controller may see that the User has clicked on the advertisement.
4. All Google AdWords customers get a different cookie, thus they cannot be tracked through the websites of AdWords customers.
5. The information gathered using conversion tracking cookies are used for generating conversion statistics for those customers who opted for AdWords conversion tracking. This way customers may get information concerning the number of users clicking on their advertisement and forwarded to websites that have a conversion tracking tag. However, they cannot obtain any information by which they could identify any of the users.
6. If you do not want to participate in conversion tracking, you can opt out by blocking cookies in your web browser. After that, you will no more be included in conversion tracking statistics.
7. For further information and Google's privacy policy, please, visit the following website: www.google.de/policies/privacy/

➤ **USING GOOGLE ANALYTICS**

1. Our website uses Google Analytics, a web analysis tool of Google Inc. ("Google"). Google Analytics uses cookies, i.e. short text files that are saved to the user's computer to help analyse how the website is used by the user.
2. The information contained in the cookies relating to the websites visited by the User is usually transmitted to and stored on one of Google's servers in the USA. If IP anonymisation is activated on the website, Google will truncate the IP-address of Users in

a European Union member state or in another state that is a party to the Treaty on the European Economic Area.

3. The full IP address is transmitted to Google's servers in the USA and is truncated there in exceptional cases only. At the request of the operator of the present website, Google uses these pieces of information for analysing how the User uses the website as well as for making reports to the website operator on the activity of the website as well as for providing other services relating to the use of the website and of the internet.
4. Within Google Analytics, the IP address transmitted by the User's web browser is not associated with any other Google data. You can prevent the storage of cookies by appropriately setting your browser, however, let us remind you that in this case you may not be able to use all the functions of the website. You can also prevent Google from collecting and processing your website usage data transmitted via cookies (including your IP-address) if you download and install the browser plugin available via the following link: <https://tools.google.com/dlpage/gaoptout?hl=hu>

VI. DATA PROCESSORS ASSIGNED

The Data Controller shall be entitled to assign data processors in relation to its activities.

As of 25 May 2018, Data Processors shall record and process personal data which are given to them by the Data Controller and are being processed by them in accordance with the provisions of the GDPR, and they shall declare same to the Data Controllers.

During the processing, the Data Controller will not transmit your personal data to any third country outside the European Economic Area.

The Data Controller shall assign the following Data Processors:

➤ Hosting Service Provider

1. Activity pursued by the Data Processor: hosting services

2. Name and contact data of the Data Processor:

Name: EZIT Kft.

Seat: 1132 Budapest, Victor Hugo utca. 18-22.

Website: www.ezit.hu

3. Scope of processing: all personal data disclosed by the User.

4. Users concerned: all Users using the services of the Website or the Service Provider, making offer / requesting offer / sending message / subscribing to newsletter on the Website.

5. Purpose of processing: providing availability and appropriate performance of the Website (hosting services).

6. Period for which personal data are processed, time limit for erasure: until the agreement concluded by and between the Data Controller and the Hosting Service Provider terminates, or until the Data Controller / User sends a request for erasure to the Hosting Service Provider.

7. Legal basis of data processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

➤ System administration services

1. Name and contact data of the Data Processor:

Name: Copy-Online Kft.

Seat: 2040 Budaörs, Sport u. 6.

Website: www.masologeparuhaz.hu

2. Activity pursued by the Data Processor: system administration services (monitoring, technical updating, security system development, other developments, repair services).

3. Scope of processing: all personal data disclosed by the User.

4. Users concerned: all Users using the services of the Website or the Service Provider, making offer / requesting offer / sending message / subscribing to newsletter on the Website.

5. Purpose of processing: system administration services (developments, monitoring and repairs).

6. Period for which personal data are processed, time limit for erasure: until the agreement concluded by and between the Data Controller and the Data Processor mentioned under this point terminates, or until the Data Controller / User sends a request for erasure to the Data Processor mentioned hereunder.

7. Legal basis of data processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

➤ Online marketing services

1. Name and contact data of the Data Processor:

Name: Tamás Csilla e.v.

Seat: 1165 Bp. Újszász u. 45/b G. ép. 1/4.

Web: www.illum-marketing.hu

2. Activity pursued by the Data Processor: online marketing services.

3. Scope of processing: name, e-mail address.

4. Users concerned: all Users using the Website and subscribing to the newsletter.

5. Purpose of processing: promotion and advertising of products available on the Website, increasing the frequency of visits to the Website.

6. Period for which personal data are processed, time limit for erasure: until the agreement concluded by and between the Data Controller and the Data Processor mentioned under this point terminates, or until the Data Controller / User sends a request for erasure to the Data Processor mentioned hereunder.

7. Legal basis of data processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

➤ Sending newsletter

1. Name and contact data of the Data Processor:

Name: EZIT Kft.

Seat: 1132 Budapest, Victor Hugo utca. 18-22.

Website: www.ezit.hu

2. Activity pursued by the Data Processor: online marketing services.

3. Scope of processing: name, e-mail address.

4. Users concerned: all Users using the Website and subscribing to the newsletter.

5. Purpose of processing: promotion and advertising of products available on the Website, increasing the frequency of visits to the Website.

6. Period for which personal data are processed, time limit for erasure: until the agreement concluded by and between the Data Controller and the Data Processor mentioned under this point terminates, or until the Data Controller / User sends a request for erasure to the Data Processor mentioned hereunder.

7. Legal basis of data processing: consent freely given by the User [Art. 6 (1) (a) of GDPR].

➤ Invoicing

1. Name and contact data of the Data Processor:

Name: ARXOFT Kft.

Seat: 2000 Szentendre, Barackvirág u. 16/b.

Website: -

2. Activity pursued by the Data Processor: invoicing.

3. Scope of processing: name and address indicated on the invoice.

4. Users concerned: all Users placing any order on the Website.

5. Purpose of processing: issuing invoices.

6. Period for which personal data are processed, time limit for erasure: 8 years, in accordance with section 169, subsection 2 of Act C of 2000 on Accounting.

7. Legal basis of data processing: processing is necessary for compliance with a legal obligation to which the Service Provider is subject [Art. 6 (1) (c) of GDPR].

➤ Accounting

1. Name and contact data of the Data Processor:

Name: Micopont Bt.

Seat: 8640 Fonyód, Mező u. 29.

Website: -

2. Activity pursued by the Data Processor: accounting.

3. Scope of processing: name and address indicated on the invoice.

4. Users concerned: all Users ordering service from the Service Provider.

5. Purpose of processing: performing accounting obligations.

6. Period for which personal data are processed, time limit for erasure: 8 years, in accordance with section 169, subsection 2 of Act C of 2000 on Accounting.

7. Legal basis of data processing: processing is necessary for compliance with a legal obligation to which the Service Provider is subject [Art. 6 (1) (c) of GDPR].

VII. USER'S RIGHTS

1. Right to access

User shall be entitled to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information set out in the Regulation.

2. Right to rectification

User shall be entitled to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the User shall have the right to have incomplete personal data completed.

3. Right to erasure

User shall be entitled to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds applies set out in the Regulation.

4. Right to be forgotten

In the case that the Data Controller has made the personal data public and is obliged to erase the personal data, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the User has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

5. Right to restrict the processing

User shall be entitled to obtain from the Data Controller restriction of processing where one of the conditions applies of Art. 18 (1) of GDPR.

6. Right to data portability

User shall be entitled to receive the personal data concerning him or her, which he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

7. Right to object

User shall be entitled to object at any time to the processing of personal data concerning him or her, including profiling as well.

8. Rights related to the automated decision-making

There is no automated decision-making at the Service Provider.

9. Right to withdraw consent

If the data processing is based on your consent, you can withdraw your consent any time. The withdrawal does not affect the lawfulness of the processing of data before the withdrawal. The Service Provider ensures that you can withdraw your consent such an easy way as you gave the consent.

10. Information request

User shall be entitled to request information at any time from the Data Controller relating to the processing of his or her personal data. The User may request access to, erasure or alteration of personal data, as well as restriction of the processing of personal data, portability of data, further he or she may object to any processing of data by the following means:

- by mail, to the address: H-2053 Herceghalom, Gesztenyés út 11.
- by e-mail, to be sent to the e-mail address: naturhun@naturhun.hu

Time limit for measures:

The Data Controller shall inform the User in writing about the measures taken upon the above requests, without undue delay but at the latest within 30 days counted from the receipt of the request.

This time limit, where appropriate, may be extended by 30 days. The Data Controller shall inform the User on the extension of the time limit within 30 days counted from the receipt of the request, together with the reasons for the delay.

If the Data Controller does not take measures upon the User's request, it shall inform the User in writing, without delay but at the latest within one month counted from the receipt of the request, on the legal and factual grounds for rejecting the request, as well as on the possibility that the User may lodge a complaint with the supervisory authority mentioned below or may seek judicial remedy.

VIII. COMMUNICATION OF A PERSONAL DATA BREACH TO THE USER

The Data Controller shall communicate, in clear and plain language, the personal data breach to the User without undue delay, if the personal data breach is likely to result in high risk to the rights and freedoms of the User(s).

In the communication addressed to the User, the Data Controller shall describe the nature of the personal data breach, the contact point where more information can be obtained, the likely consequences of the personal data breach, as well as the measures taken or proposed to be taken to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the User shall not be required if any conditions of Art 34 (3) GDPR are met.

IX. POSSIBILITIES OF ENFORCING RIGHTS

1. The User may send any observation relating to the processing of personal data concerning him or her to the Data Controller on the following addresses:

- by mail: H-2053 Herceghalom, Gesztenyés út 11.

- by e-mail: naturhun@naturhun.hu

2. In case of the Data Controller's infringement, a complaint may be lodged with the National Authority for Data Protection and Freedom of Information.

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Post office box: 5.

Telephone number: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

3. If the National Authority for Data Protection and Freedom of Information does not deal with your complaint submitted to them, or does not inform you about the process or result of the procedure within three months, or you think that the data processing related to you harms your data protection rights, you are entitled to go to court. In this case, the lawsuit against the authority shall be commenced before the Metropolitan Court, or before the court at your usual residence. In

case of harm of your rights, lawsuit against the Service Provider shall also be commenced before the Metropolitan Court, or before the court at your usual residence.

4. If the User has disclosed the personal data of a third person when registering in order to use the services, or has caused damage in any way when using the Website, the Data Controller shall be entitled to claim for damages against the User. In such cases, the Data controller shall take all necessary measures to provide assistance to the proceeding authorities in order to identify the infringer.

X. MISCELLANEOUS PROVISIONS

1. The Data Controller's system may collect information relating to the activity of the Users which shall be combined neither with any other data provided by the User at the registration, nor with any data generated in the course of visiting other websites or using other services.

2. The Data Controllers commits to secure personal data, to take all technical measures ensuring the protection of any personal data recorded, stored or processed, as well as to take all necessary steps to prevent the destruction, unlawful use or unlawful alteration of such data. It commits further to call on any third person, to whom it potentially discloses or transmits the data, to fulfil their obligations hereunder.

3. The Data Controller declares that circumstances set out in Art. 37 (1) of GDPR do not exist; therefore, no data protection officer has been designated.

When processing personal data, the Data Controller shall pay attention to proceeding in accordance with legal provisions in force relating to data protection, as well as in line with the well-established practice of the data protection authority. The Data Controller's principles of data processing are in accordance with legal provisions in force relating to data protection, including but not limited to:

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 (GDPR);

Act V of 2013 on the Civil Code;

Act XLVIII of 2008 on the essential conditions and certain limitations of business advertising activity.