

PRIVACY POLICY

Privacy Policy

NATURHUN Korlátolt Felelősségű Társaság

(last modified on: 26 September 2024)

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/> , and <https://es.naturhun.hu> (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 Hungarian, German, English, French, Spanish and Italian Websites (<https://naturhun.de/>, <https://naturhun.co.uk/>, <https://naturhun.fr/>, <https://es.naturhun.hu>, <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, 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. The offers are sent to the MiniCRM system.

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.

➤ CONTACT DIRECTLY AT THE E-MAIL ADDRESSES OR TELEPHONE NUMBERS PROVIDED ON THE WEBSITE

If you have any questions about using our services, you can contact the Data Controller using the contact details provided in this Policy or on the Website.

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
Other personal data you have provided	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 contacted us 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 sending message	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 Policy. The Data Controller uses MailerLite to send the newsletter.

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.

➤ **COMPLAINTS, COMPLAINT HANDLING**

Please note that you have the right to make a complaint or raise a grievance about the quality of the service we provide or about any other problem you may have.

Scope and purpose of processing:

Personal data	Purpose of processing
Name, address, detailed description of the complaint	Investigating complaints, following the filing of a complaint, and maintaining contact.
The name of the consumer, the consumer's address, the place, time and manner of filing the complaint, a detailed description of the consumer's complaint, a list of the documents, records and other evidence presented by the consumer, a statement by the Data Controller of the Consumer's	If it is not possible to investigate the complaint on the first notification, record the complaint submitted, investigate further, contact.

position on the complaint, if an immediate investigation of the complaint is possible, the signature of the person who took the minutes and, except for complaints made by telephone or electronic means, the consumer, the place and time of taking the minutes, and, in the case of an oral complaint made by telephone or electronic means, the unique identification number of the complaint	
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Users concerned: complainant.

Period for which personal data are processed, time limit for erasure: we are obliged to process the data for 3 years from the date of the record.

Potential recipients of personal data entitled to access to personal data: personal data may be processed by authorised employees of the Data Controller.

Legal basis of processing: Fulfilling a legal obligation. [Article 6(1)(c) GDPR, Article 17/A(5) of Act CLV of 1997 on Consumer Protection]

➤ MARKETING, USER EXPERIENCE, COOKIES, OTHER TECHNOLOGIES

We would like to inform you that on <https://naturhun.de/>, <https://naturhun.co.uk/>, <https://naturhun.fr/> we use the online advertising program "Google Ads", as well as Google Analytics and Meta (Facebook, Instagram) ads.

We also use Google Analytics on the Website.

To use these programs, we need to use cookies. For further information about the cookies how you can change your settings are set out in the Cookie Policy, which you can access by clicking <https://naturhun.de/cookie-richtlinie/>

As regards the use of these programmes, we inform you of the following:

a) USING GOOGLE ADS

We inform you that the Google Ads service is embedded on our websites <https://naturhun.de/>, <https://naturhun.co.uk/>, <https://naturhun.fr/>.

Scope and purpose of processing:

Personal data	Purpose of processing
IP address, information about your device, information about your operating system, information about your browser.	With Google Ads, we can launch and run ad campaigns, which allows us to run campaigns using advertising keywords. This

	way, if you have previously visited our Sites, we can advertise services that you have previously been interested in.
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Users concerned: All Users who have visited any of the Sites <https://naturhun.de/>, <https://naturhun.co.uk/>, <https://naturhun.fr/> and have accepted the related cookie application.

Period for which personal data are processed, time limit for erasure: We will process your data only for as long as necessary to achieve those purposes or until you have withdrawn your consent.

Potential recipients of personal data entitled to access to personal data: The service is provided by Google (Google Ireland Limited, registration number 368047, tax number IE6388047V, registered office Gordon House, Barrow Street Dublin 4 Ireland).

Legal basis of processing: freely given by the User, which you can give us during the cookie settings. [Article 6(1)(a) GDPR]

b) META (INSTAGRAM, FACEBOOK)

Please note that we use Meta (Facebook, Instagram) pixels on the Websites, which are activated with your consent and thus Facebook and Instagram will also process your data. Your consent is required to activate the pixels.

The following data is processed in connection with the use of Meta (Facebook, Instagram) pixels:

Personal data	Purpose of processing
IP address, information about your device, information about your operating system, information about your browser.	We use Meta (Facebook, Instagram) pixels to display ads and information about our services and offers on Instagram or Facebook. We also use the pixels to collect data on the success of Facebook and Instagram ads.

Users concerned: All Users who have visited any of the Websites and have consented to the use of pixels.

Period for which personal data are processed, time limit for erasure: We will process your data only for as long as necessary to achieve those purposes.

Potential recipients of personal data entitled to access to personal data: Please note that in certain cases we may also be considered a joint controller with Meta (Facebook, Instagram).

Meta's privacy policy is available here:

https://www.facebook.com/privacy/policy/?entry_point=facebook_page_footer

Legal basis of processing: freely given by the User, which you can give us during the cookie settings. [Article 6(1)(a) GDPR]

Data transfers: Please note that data may be transferred to countries outside the EEA, such as the United States of America, which has a Commission adequacy decision.

c) GOOGLE ANALYTICS

We inform you that we use Google Analytics, a web analytics service provided by Google, on the Websites.

We also inform you that the information generated by the cookies used by the User in connection with the Website is usually transmitted to and stored on a Google server in the USA. By activating IP anonymisation on the Website, Google may use the IP address of the User to identify the User's computer within the Member States of the European Union or other countries that are party to the Agreement on the European Economic Area.

Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the website operator, Google will use this information to evaluate how the User has used the website, to compile reports on website activity for the website operator and to provide additional services relating to website and Internet use.

We inform you that using Google Analytics requires cookie settings, which you can read more about in our <https://naturhun.de/cookie-richtlinie/>

Scope and purpose of processing:

Personal data	Purpose of processing
IP address, the unique user identifier provided by the browser, the user's clicking habits on the website, the subpages the user accesses, the browser type, URL, screen resolution, timestamp.	We use Google Analytics to analyze and report on your use of the Websites and your activities on the Websites.

Period for which personal data are processed, time limit for erasure: We will only use your data for as long as necessary to achieve those purposes.

Potential recipients of personal data entitled to access to personal data: The service is provided by Google (Google Ireland Limited, registration number 368047, tax number IE6388047V, registered office Gordon House, Barrow Street Dublin 4 Ireland).

Google's privacy policy is available at the following link: <https://policies.google.com/privacy?hl=hu>

Legal basis of processing: freely given by the User, which you can give us during the cookie settings. [Article 6(1)(a) GDPR]

Data transfers: please note that data may be transferred to countries outside the EEA, such as the United States of America, which has a Commission adequacy decision.

V. 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: **Websupport Magyarország Korlátolt Felelősségű Társaság**

Registration number: 01-09-381419

Tax number: 25138205-2-43

Managing Director: Sara Maria Laurell

Seat: 1119 Budapest, Fehérvári út 97-99

Website: <https://www.websupport.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.10

Registration number: 13-09-185858

Tac number: 13575553-2-13

Seat: 2040 Budaörs, Sport u. 6.

Website: <https://ink.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: RG-STÚDIÓ Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság

Seat: 7623 Pécs, Ungvár utca 47.

Tax number: 11113285-2-02

representative: Schmidt Zsuzsanna

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: MailerLite Limited

Seat: 38 Mount Street Upper, Dublin 2, D02 PR89 Ireland

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: KULCS-SOFT NYRT.

Registration number: 01-10-045531

Tax number: 13812203-2-41

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

Managing Director: Kulcsár Tibor

Website: <https://www.kulcs-soft.hu>

Name: **Billingo Technologies Zártkörűen Működő Részvénytársaság**

Registration number: 01-10-140802

Tax number: 27926309-2-41

Seat: 1133 Budapest, Árbóc utca 6.

CEO: Sárospataki Albert

Web: <https://www.billingo.hu>

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: DE-FACTO KFT.

Registration number: 01-09-561423

Tax number: 12172126-2-43

Seat: 8640 Fonyód, Mező u. 29.

Managing director: Durbák János

Web: <https://de-facto.hu>

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].

➤ Website management

1. Name and contact data of the Data Processor:

Name: Varju Ildikó E.V.

Seat: 7133 Fadd, Arany J. u. 5.

Phone +36 306538439

Web: <https://ildeesigner.hu>

2. Activity pursued by the Data Processor: Website maintenance and management.

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

4. Users concerned: all Users using the Website or the Service Provider's services or making an offer / requesting an offer / sending a message via the Website.

5. Purpose of processing: Carrying out the maintenance necessary for the proper operation of the Websites, managing the Websites.
6. Period for which personal data are processed, time limit for erasure: lasts until the termination of the agreement between the Data Controller and the processor referred to in this point or until the Data Controller /User's request for erasure to the processor referred to in this point.
7. Legal basis of data processing: consent freely given by the User [Article 6(1)(a) GDPR].

➤ Use enterprise management software

1. Name and contact data of the Data Processor:

Name: MiniCRM Zrt

Registration number: 01-10-047449

Tax number: 23982273-2-42

Seat: 1075 Budapest, Madách Imre út 13-14.

CEO: Egerszegi Krisztián

2. Activity pursued by the Data Processor: provide corporate governance softer.

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

4. Users concerned: all Users who use the services of the Website or the Service Provider or who make an offer / request an offer / send a message / subscribe to a newsletter via the Website.

5. Purpose of processing: management of the Data Controller's corporate processes, corporate governance.

6. Period for which personal data are processed, time limit for erasure: lasts until the termination of the agreement between the Data Controller and the processor referred to in this point or until the Data Controller /User's request for erasure to the processor referred to in this point.

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].

VI. 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.

VII. 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.

VIII. 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.

1055 Budapest, Falk Miksa u. 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Telephone number: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: <https://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.

IX. 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.