

# Privacy Policy

## 1. Name and contact information of the data controller

Name of the data controller: Kaviczky-Prémium Kft. (hereinafter referred to as: Data Controller)

Company registration number: 13-09- 149135, Address: 2030 Érd, Balatoni utca 66.

Tax number of the Data Controller: 23464973-2-13

Website: [www.kaviczky.hu](http://www.kaviczky.hu)

Postal address of the Data Controller: 2030 Érd, Balatoni utca 66.

E-mail address of the Data Controller: [kaviczky@kaviczky.hu](mailto:kaviczky@kaviczky.hu)

Phone number of the Data Controller: 06(23)399-624; 06(20)353-2345

Person liable for data processing: Kaviczky-László Ágnes managing director

## 2. Regulatory background, legal basis and goal of the data processing performed on the website, the scope personal data processed as well as the duration of the data processing operation

### 2.1. Information on the use of Cookies

#### *About cookies:*

The Data Controller uses so called cookies during the course of visits to the website. Cookies are information packages consisting of letters and numbers which are sent by our website to your browser in order to save certain settings, which help to make our website easier to use and also contributes in a sense by collecting some relevant information of statistical nature of our visitors

#### *The legal basis and regulatory background for cookies:*

The background for data processing is provided by the provision of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.) and by Act CVIII of 2001 on certain issues of electronic commerce activities and information society services. The legal basis for data processing is your explicit consent, pursuant to Section 5 (1) paragraph a.) of the Infotv.

#### *Main characteristics of cookies used by the website:*

In order to provide personalized services, the Company places a small information package (so called „cookie”) on your computer. The goal of the cookie is to provide the highest possible quality of operation, in order to increase user experience. By visiting the website and using its certain features you give your consent that the mentioned cookies are saved on your computer and that the Data Controller can access them. As a general rule, cookies are stored for 30 days; however with the help of your browser you can configure and block activities related to cookies. However in the latter case we would like to draw your attention

to the fact that without the use of cookies it may occur that you will not be able to use all services of the website.

## *2.2. Data processing in connection with registration, ordering and invoicing*

### *The legal basis and regulatory background for data processing.*

The background for data processing is provided by the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.) and by Act C of 2000 on Accounting (Sztv.). The legal basis for data processing is your explicit consent, pursuant to Section 5 (1) paragraph a.) of the Infotv and –in the case of the withdrawal of your consent- the legal obligation of the Data Controller defined in the Sztv. based on Sections 6 (5) paragraph a.) of the Infotv.

### *Purpose of data processing:*

Marketing purposes, the sending of newsletters, reviews, advertisements and offers. The issuance of legally appropriate invoices and the fulfilment of the obligations regarding the retainment of accounting documents. Pursuant to Section 169 (1)-(2) of Sztv., business organisation are obliged to retain all accounting documents directly or indirectly evidencing bookkeeping accounting.

### *Scope of the processed data:*

Name, address, telephone number, e-mail address, place of delivery, billing name and address is required for the purposes of registration and invoicing.

From professional partners, the document certifying the professional qualification, the name, address, contact information of the salon, the tax number as well as the billing name and address is required. From retailers the name, title and the legal basis for its rights of representation of the company's representative is required.

### *The duration of the data processing operation:*

From the registration, until the withdrawal of consent by the data subject.

Pursuant to Section 169 (2) of the Sztv. invoices have to be retained for a duration of 8 years from the date of their issuance. We inform you that in case the consent for issuing the invoice is withdrawn, the Data Controller will be entitled to retain the data, that has been accessed over the course of issuing the invoice pursuant to Section 6 (5) paragraph a.) of the Infotv.

## *2.3. Data processing in connection to the delivery of goods:*

The background for data processing is provided by the provision of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.). The legal basis for data processing is your explicit consent, pursuant to Section 5 (1) paragraph a.) of the Infotv.

*The purpose of data processing:*

In case of delivery, the purpose of data processing is to adapt to your needs and get the ordered goods delivered to you co-operation by our contractual partner.

*Scope of the processed data:*

The required processed data is your name, delivery address and phone number.

*The duration of the data processing operation:*

Data controller processes the data for the duration of the delivery of the ordered goods.

*2.4. Data processing in connection with newsletters*

*The legal basis and regulatory background for data processing:*

The background for data processing is provided by the provision of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.) and Act XLVIII of 2008 on the essential conditions and certain limitations of business advertising activity (Grt.). The legal basis for data processing is your explicit consent, pursuant to Section 5 (1) paragraph a.) of the Infotv and Section 6 (1) – (2) of the Grt.

*Purpose of data processing:*

The purpose of data processing is to inform you about the latest and best offers and sales. We inform you that the newsletter will not only contain advertisements from the Data Controller but from other business organisations as well. However your personal data will not be transferred or handed over to them.

*Scope of the processed data:*

The name and e-mail address is required for the data processing.

*The duration of the data processing operation:*

Until the withdrawal of consent

*2.5. Data processing in connection with the sending and display of customised advertisements:*

*The legal basis and regulatory background for data processing:*

The background for data processing is provided by the provision of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.) and Act XLVIII of 2008 on the essential conditions and certain limitations of business advertising activity (Grt.). The legal basis for data processing is your explicit consent, pursuant to Section 5 (1) paragraph a.) of the Infotv and Section 6 (1) – (2) of the Grt.

*Purpose of data processing:*

The purpose of data processing is to provide you with customised offers most suited to your preferences and needs.

*Scope of the processed data:*

During the data processing operation, the Data Controller records data regarding the types of goods that have been previously looked up with the help of cookies.

*The duration of the data processing operation:*

Until the withdrawal of consent

## *2.6. Data processing in connection with contact information*

*The legal basis and regulatory background for data processing:*

The background for data processing is provided by the provision of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.). The legal basis for data processing is your explicit consent, pursuant to Section 5 (1) paragraph a.) of the Infotv.

*Purpose of data processing:*

The purpose of the data processing is to answer the question you have asked from us.

*Scope of the processed data:*

*Name and contact details (e-mail or phone number) to be provided at contact.*

*The duration of the data processing operation:*

Messages sent during contact are stored for a maximum of one month, but deletion of the personal data provided during contact can be requested any time.

## *2.7. Further data processing operations*

If the Data Controller wishes to perform further data processing, prior notification has to be provided on the substantial details of the processing operation (Regulatory background, legal basis and goal of the data processing performed on the website, the scope personal data processed as well as the duration of the data processing operation).

We inform you, that the Data Controller has to comply with and fulfil written data requests that are made by authorities based on the law. According to Section 15 (2) – (3) of the Infotv. the Data Controller maintains a register on data transfers (to which authority, which personal data, on what legal basis, at what time has the Data Controller transferred), on which it provides information if requested, except when this information is excluded by law.

## *2.8.OTP Mobile*

By clicking the Redirect button the Customer accepts Kaviczky-Prémium Kft. (2030 Érd, Balatoni utca 66.) at [www.kaviczky.hu](http://www.kaviczky.hu) to provide the following personal data stored in its user database to OTP Mobile Ltd. (1093 Budapest, Közraktár utca 30.)

Provided data: username, family name, given name, country, phone number, e-mail address.  
The purpose of data transmission: customer support for users, confirming transactions and fraud-monitoring for users defence.

### **3. On the use of a Data Processor and on our activities in connection with data processing**

#### *3.1. Data processing by way of storage of personal data*

**Name of storage provider:** Fókusz Computer Kft.

**Address of storage provider:** 2030 Érd, György u. 56.

Fókusz Computer Kft. performs the storage of personal data on its servers located under 2040 Budaörs, Ipartelep u. 13-15. It is not entitled to access the stored personal data.

#### *3.2. Data process activities in connection with the delivery of goods*

Name of data processor: GLS General Logistics Systems Hungary Csomag - Logisztikai Kft. (GLS Hungary Kft.)

Postal address of data processor: 2351 Alsónémedi, GLS Európa u. 2.

E-mail address of data processor: info@glshungary.com

Phone number of data processor: +36-1/802-0265

Representative of the data processor: Farkas Gergely managing director

GLS Hungary Kft. co-operates in the delivery of the ordered goods based on the written agreement concluded with Data Controller. During the course of doing so, GLS Hungary Kft. will process the name and telephone number of the customer for a corresponding period set out in the privacy policy of GLS Hungary, and then deletes it immediately.

### **4. Data security measures**

The Data Controller declares that it has made suitable data security measures in order to protect personal data against unauthorized access, alteration, transmission, public disclosure, deletion or destruction, as well as damage and accidental loss, and to ensure that stored data cannot be corrupted and rendered inaccessible due to any changes in or modification of the applied technique.

### **5. Your right during the course of the data processing operation**

During the course of the data processing you are entitled to the following:

- right of information,
- right of rectification of the processed data,
- right of erasure of the processed data,
- right of blocking the processed data,
- right of objection.

During the course of the data processing operation you are entitled to request information from the Data Controller on the processing of your personal data.

The Data Controller has to inform you in writing in a clear and understandable way on the processed personal data, the purpose of the data processing, the legal basis and duration of

the processing operation, furthermore –if the data has been transferred- on the details of whom, and with what legal purpose has received the personal data. This information has to be provided as soon as possible but at most within 30 days from the submission of the information request.

You are entitled to request the rectification of your personal data by the Data Controller within the duration of the data processing. The Data Controller will satisfy your request within a maximum of 15 days.

You are entitled to request the deletion of your personal data by the Data Controller, which the Data Controller will satisfy within a maximum of 15 days. The right of deletion does not cover the cases where the Data Controller is obligated by law to further store the data as well as in the case when the Data Controller is entitled to further process the data pursuant to Section 6 (5) of the Infotv. (e.g. in connection to billing)

You are entitled to request the Data Controller to block your personal data if the final erasure of the data would harm the legitimate interest of the data subject. Such blocked data can only be processed as long as the purpose that excluded the erasure of the personal data still persists.

You can object to the processing of your personal,

- if processing or disclosure is carried out solely for the purpose of discharging the Data Controller's legal obligation or for enforcing the rights and legitimate interests of the controller, the recipient or a third party, unless processing is mandatory and in the case described in Section 6 (5) of the Infotv.
- if personal data –without your consent- is used or transferred for the purposes of direct marketing, public opinion polling or scientific research.

Data Controller shall investigate the objection within the shortest possible time of a maximum of 15 days from its submission, adopt a decision on the merits of the objection and shall inform you of its decision in writing.

## **6. Legal remedies**

If, according to you, the Data Controller has violated one of the provision related to data processing, or has not fulfilled one of your requests, than you have the right to initiate inspections proceedings of the Nemzeti Adatvédelmi és Információszabadság Hatóság (address: 1530 Budapest, Pf.: 5., e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) in order to terminate the presumed unlawful data processing operation.

In addition we inform you, that in case of violation of the applicable laws for data processing or if the Data Controller has not fulfilled one of your requests, you also have the right to turn to a court for judicial remedy against the Data Controller.

## **7. Report to the data protection register**

In accordance with the provisions of the Infotv., the Data Controller has to report data processing in connection with its marketing activities to the data protection register. **The National Data Protection and Freedom of Information Authority has accepted our submission for data processing operations in with registration number Kavic635834543949482943. in connection with these activities.**

## **8. Other, Amendments and modifications to the Privacy Policy**

Data Controller reserves the right to modify this current privacy policy. By using the website after such modification come into effect you agree to the new and modified privacy policy. Data Controller will ensure that in the event of a modification the former version of the text is also made available on the website.

This Privacy Policy shall be governed by the laws of Hungary. This Privacy Policy has been prepared in both Hungarian and English languages, in case of any discrepancies between the two versions, the Hungarian version shall apply.

**Érd, 1 October 2015**

**Kaviczky-Prémium Kft.**