

PRIVACY POLICY AND INFORMATION NOTICE

15 October 2024

1. INTRODUCTORY PROVISIONS

1.1 This Privacy Policy and Information Notice ("Privacy Policy") applies to the processing of personal data carried out by POSSESSIO Limited Liability Company (address: HU1165 Budapest, Hófehérke u. 6. 3/7. Hungary; company registration number: 01 09 993204; tax number: 23947887-2-42; "Service Provider").

1.2 The Service Provider shall be entitled to amend the Privacy Policy. The Service Provider shall publish any amendments to the Privacy Policy on its website and shall notify its existing affected customers of the amendments in advance. Amendments to the Privacy Policy shall apply after publication and, in the case of existing affected customers, after acceptance of the amendment. The Service Provider shall be entitled to make the provision of any of its services conditional upon acceptance of the Privacy Policy.

1.3 The Service Provider undertakes to ensure that the processing of data in relation to its activities complies with the Privacy Policy. Guidance on the Service Provider's data management practices is available at <http://www.possessio-ltd.hu> ("Website").

2. PRINCIPLES OF DATA MANAGEMENT

2.1 The Service Provider is committed to protecting the personal data of its customers and partners and attaches the utmost importance to respecting the right of information self-determination of its customers.

2.2 The Service Provider shall take all reasonable steps to ensure the security of the data, and shall provide an adequate level of protection, in particular against unauthorised access, alteration, disclosure, deletion or destruction, accidental destruction or accidental damage. The Service Provider shall ensure the security of the data by appropriate technical and organisational measures.

2.3 The Privacy Policy is in compliance with the applicable EU and Hungarian legislation on data protection, in particular with the following:

2.3.1 Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing of personal data of natural persons (GDPR)

2.3.2 Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Info tv.)

2.3.3 Act V of 2013 on the Civil Code (Civil Code Act)

2.3.4 Act CVIII of 2001 on certain aspects of electronic commerce services and information society services - (Eker tv.)

2.3.5 Act C of 2003 on Electronic Communications - (Ehtv)

2.3.6 Act CLV of 1997 on Consumer Protection (Fogyv tv.)

2.3.7 Act CLXV of 2013 on complaints and notifications of public interest (Pktv.)

2.3.8 Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities (Grtv.)

2.4 The Service Provider shall process only and exclusively the personal data of the persons specified in the Privacy Policy, for the time, duration and for the purposes previously specified in the Privacy Policy and for which the person concerned has given his/her consent or the processing of which is required or permitted by law.

3. DEFINITIONS

3.1 In this Privacy Policy, the following terms have the following meanings:

3.1.1 Data Subject: any specified natural person who is identified or identifiable, directly or indirectly, on the basis of Personal Data;

3.1.2 personal data: data which can be associated with a data subject, in particular the name, the identification mark and one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of the data subject, and the inference which can be drawn from the data concerning the data subject;

3.1.3 consent: a voluntary and freely given indication of the data subject's wishes, based on appropriate information, by which he or she signifies his or her unambiguous agreement to the processing of personal data relating to him or her, whether in full or in part;

3.1.4 objection: a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data;

3.1.5 data controller: the natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes for which the data are processed, takes and implements decisions regarding the processing (including the means used) or has the processing carried out by a processor on its behalf;

3.1.6 Data processing: any operation or set of operations which is performed upon data, regardless of the procedure used, in particular any collection, recording, recording, organisation, storage, alteration, use, consultation, retrieval, disclosure, alignment or combination, blocking, erasure or destruction of data, prevention of their further use, taking of photographs, audio or video recordings, or any other physical means of identification of a person (e.g. fingerprints, palm prints, DNA samples, iris scans);

3.1.7 'transfer' means making data available to a specified third party;

3.1.8 data erasure: rendering data unrecognisable in such a way that it is no longer possible to recover it;

3.1.9 data marking: the marking of data with an identification mark to distinguish it;

3.1.10 data blocking: the marking of data with an identification mark for the purpose of limiting its further processing permanently or for a limited period of time;

3.1.11 data destruction: the total physical destruction of the data medium containing the data;

3.1.12 'processing' means the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;

3.1.13 data processor: a natural or legal person or unincorporated body who or which processes data on the basis of a contract with the controller, including a contract concluded pursuant to a legal provision;

3.1.14 'data file' means the set of data processed in a register;

3.1.15 'third party' means a natural or legal person or an unincorporated body other than the data subject, the controller or the processor;

3.2 Terms not defined in this notice shall have the meanings given to them in the Infotv.

4. CERTAIN DATA PROCESSING BY THE SERVICE PROVIDER

4.1 The Service Provider processes personal data on the basis of (i) the voluntary consent of the data subjects; and (ii) in certain cases, mandatory applicable legislation (such as the Taxation Act or the Personal Income Tax Act), as detailed below.

4.2 The Service Provider draws the attention of those who provide data to it to the fact that if they do not provide their own personal data, the data provider is obliged to obtain the consent of the data subject.

4.3 The Service Provider informs its customers that the court, the prosecutor, the investigative authority, the criminal investigation authority, the administrative authority, the data protection commissioner or other bodies authorized by law may request the Service Provider to provide information, to disclose or transfer data or to provide documents. The Service Provider shall only disclose personal data to the authorities to the extent and to the extent that it is indispensable for the purpose of the request, provided that the authorities have indicated the precise purpose and scope of the data.

4.4 Specific processing carried out by the Service Provider

4.4.1 Processing of customer (potential) data relating to enquiries and requests for quotation

The purpose of the processing is to respond to enquiries/requests for quotations, to maintain contact. Legal basis for processing: consent of the data subject (Infotv. 5. § (1) a)).

Data processed: customer data (name, address, telephone number, e-mail, bank account number, tax number, contact name, contact telephone number, billing address and name) provided by the customer during requests for quotations and enquiries by telephone, in writing or online.

Duration of data processing: 1 year.

Transmission of data: -

Processing of data: - 1 year.

4.4.2 Management of customer data related to contracting

The purpose of data processing is to process the order, to service the order, to document the purchase and payment, and to fulfil accounting obligations. Legal basis for data processing: consent of the data subject (Infotv. 5 (1) a), and statutory authorisation (Section 169 (2) of the Act on the Payment of Bills of Accounts).

Scope of data processed: customer data (name, address, telephone number, e-mail, bank account number, tax number, contact name, contact telephone number, billing address and name) provided by the customer by telephone, in writing or online when concluding a contract.

Duration of data processing: 8 years.

Transmission of data: -

Processing of data: -

4.4.3 Data processing for marketing purposes

Purpose of data processing: registration of interested parties/customers, differentiation, analysis of customer habits, sending direct marketing messages (SMS and newsletter).

Legal basis for processing: consent of the data subject (Info § 5 (1) a) and Grt. 6. §).

Data processed: data provided by the customer (name, address, telephone number, e-mail, contact details), direct marketing consent.

Duration of processing: until the date of unsubscription.

Transmission of data: -

Data processing: -

4.4.4 Recording of telephone conversations

Purpose of data processing: to document customer needs and problems and to deal with them more efficiently

Legal basis for processing: legal authorisation (Article 17/B(3) of Act CLV of 1997 on Consumer Protection).

Data processed: telephone conversation between the customer and the Service Provider, date and time of the conversation.

Duration of data processing: 5 years.

Data transmission: -

Processing of data: - 5 days.

4.4.6 Other data processing

The Service Provider will provide detailed and legally compliant information on data processing not listed in the Privacy Policy at the time of data collection.

5. CONTACT DETAILS OF THE SERVICE PROVIDER

5.1 You may exercise certain rights, requests or other comments concerning the processing of your data by the Service Provider by registered or certified mail or electronically via the following contact details:

POSSESSIO Limited Liability Company. Address: 1165 Budapest, Hófehérke u. 6. 3/7;
telephone number: 06 20 444 3816; e-mail address: office@possessio-ltd.eu).

5.2 Our Company is not obliged to appoint a Data Protection Officer under Article 37 of the GDPR

6. DETAILS AND CONTACT DETAILS OF DATA PROCESSORS

6.1 In addition to those specified above, the Service Provider uses the following data processors for the processing of personal data:

6.1.1 Postal delivery. Hungarian Postal Service. 1138 Budapest, Dunavirág u. 2-6. 01-10-042463 Tax number: 10901232-2-44

6.1.2 Warehouse service: Rackhost Zrt. ; Address: 6722 Szeged, Tisza Lajos körút 41. ; Tax identification number: 25333572-2-06 ; Company registration number: 06-10-000489

6.1.3 Website management: WPViking Kft. 4200 Hajdúszoboszló, Köszialja utca 16.

7. RIGHTS OF DATA SUBJECTS AND THEIR ENFORCEMENT

7.1 The data subject may apply to the Service Provider for

7.1.1 to be informed about the processing of his/her personal data,

7.1.2 rectification of his/her personal data; and

7.1.3 the erasure or blocking of his/her personal data, except for mandatory processing.

7.2 Upon the data subject's request, the Service Provider shall provide information about the data processed by the Service Provider or by a data processor, the source of the data, the purpose, legal basis and duration of the data processing, the name and address of the data processor and the activities related to the data processing, and - in case of transfer of the data subject's personal data - the legal basis and the recipient of the data transfer.

7.3 The Service Provider shall provide the information in writing in an intelligible form within the shortest possible time from the date of the request, but not later than 25 days, upon the data subject's request.

7.4 The information described above shall be provided free of charge if the person requesting the information has not yet submitted a request for information to the Service Provider for the same data in the current year. In other cases, a fee may be charged. The amount of the fee may be fixed in a contract between the parties. Any compensation already paid shall be refunded if the data have been processed unlawfully or if the request for information has led to a correction.

7.5 The Service Provider may refuse to provide the data subject with information only in the cases specified in the Information Act.

7.6 In the event of refusal to provide information, the Service Provider shall inform the data subject in writing of the provision of this Act on the basis of which the information was refused. In the event of refusal to provide information, the Service Provider shall inform the data subject of the possibility of judicial remedy and of recourse to the National Authority for Data Protection and Freedom of Information.

7.7 If the personal data is not accurate and the accurate personal data is available to the Service Provider, the Service Provider shall correct the personal data.

7.8 The personal data shall be deleted if

7.8.1 the processing is unlawful;

7.8.2 the data subject requests it, as provided for in the Data Protection Act;

7.8.3 it is incomplete or inaccurate - and this condition cannot be lawfully remedied - provided that deletion is not precluded by law;

7.8.4 the purpose of the processing has ceased to exist or the time limit for the storage of the data laid down by law has expired;

7.8.5 it has been ordered by a court or public authority.

7.9 In the case specified in the above paragraph, the obligation to erase does not apply to personal data whose data medium is subject to archival custody under the law on the protection of archival material.

7.10 Instead of erasure, the Service Provider shall block the personal data if the data subject so requests or if, on the basis of the information available to it, it is likely that erasure would harm the legitimate interests of the data subject. The personal data blocked in this way may be processed only for as long as the processing purpose which precluded the deletion of the personal data persists.

7.11 The Service Provider shall mark the personal data that it processes if the data subject contests the accuracy or correctness of the personal data, but the incorrectness or inaccuracy of the contested personal data cannot be clearly established.

7.12 The Service Provider shall notify the rectification, blocking, marking and erasure to the data subject and to all those to whom the data were previously transmitted for processing. The notification may be omitted if this does not prejudice the legitimate interests of the data subject in relation to the purposes of the processing.

7.14 The data subject may object to the processing of his or her personal data,

7.14.1 if the processing or transfer of the personal data is necessary for the fulfilment of a legal obligation to which the controller is subject or for the purposes of the legitimate interests pursued by the controller, the recipient or a third party, except in the case of mandatory processing;

7.14.2 where the personal data are used or transmitted for direct marketing, public opinion polling or scientific research purposes; and

7.14.3 in other cases provided by law.

7.15 The Service Provider shall examine the objection within the shortest possible period of time from the date of the request, but not later than 15 days, and shall decide whether the objection is justified and inform the applicant in writing of its decision.

7.16 If the Service Provider establishes that the objection of the data subject is justified, it shall terminate the processing, including further recording and transmission of data, and block the data, and shall notify all those to whom the personal data concerned by the objection was previously transmitted and who are obliged to take measures to enforce the right to object, of the objection and of the measures taken on the basis of the objection.

7.17 If the data subject does not agree with the decision of the Service Provider, or if the Service Provider fails to comply with the deadline, the data subject may, within 30 days of the notification of the decision or the last day of the deadline, take the matter to court in accordance with the Information Act.

7.18 The Service Provider may not delete the data of the data subject if the data processing is ordered by law. However, the data may not be transferred to the data recipient if the Service Provider has agreed to the objection or the court has ruled that the objection is justified.

7.19 In the event of a perceived violation of rights in connection with the processing of personal data, any data subject may also apply to the competent court, the Metropolitan Court of Budapest or initiate an investigation at the National Authority for Data Protection and Freedom of Information (President: dr. Attila Péterfalvi, 1024 Budapest, Szilágyi Erzsébet fasor 22/C., Hungary, email: ugyfelszolgalat@naih.hu, +36-1- 3911400, www.naih.hu).

8. INFORMATION ABOUT THE USE OF COOKIES BY THE SERVICE PROVIDER

8.1 "Cookies" are small text files (data packets) that are placed on the computer of the visitor when visiting the Website. Cookies are used to help the Website to function and operate more efficiently and to provide information to the owners of the Website.

8.2 The Service Provider uses Cookies to improve the usability and functionality of the Website and to better understand how visitors to the Website use the Website and the tools and services provided on the Website. The Cookies are stored on the computers of visitors to the Site for the purpose of making the Site more fun and enjoyable on their next visit. This information is used only internally to enable us to conduct research about your demographics and interests. Anonymous or generic data, from which your identity cannot be identified, does not constitute personal data within the meaning of the Infotv.

8.3 The Service Provider does not use Cookies to collect personally identifiable information, such as names, but reserves the right to link the information in Cookies to personally identifiable information otherwise obtained from visitors to the Site. The Service Provider does not use or allow cookies that allow third parties to collect information without your consent.

8.4 Cookie settings can be changed at any time in the browser of the Website visitor. It is important to note, however, that if Cookie settings are changed, it may not be possible to use all of the Site's features.

8.5 The following types of cookies may be used when visiting the Website:

8.5.1 Cookies necessary for the functioning of the Website These are Cookies that are strictly necessary for the functioning of a Website. Without these cookies, the Website will not function properly.

8.5.2 Cookies that help the Website to function properly These are Cookies that help the Website to function better. For example, some Cookies remember content previously viewed on the Website. Cookies that help the Website to work therefore allow you to personalise the content to your interests and save time by not having to re-enter information you have already provided when you return to the Website or access parts of it that are available by registering.

8.5.3 First party cookies These are cookies that are placed by the Website and can only be read by this Website.

8.5.4 Third party cookies These are cookies that are set by third parties and can be used for various services. You can read more about third party cookies here on this page: <https://policies.google.com/technologies/cookies?hl=hu#types-of-cookies>

8.7 Integration of third party services and content

We may integrate content or services from third parties, such as city maps or fonts from other websites, into our online services. Third party services are outside the scope of POSSESSIO Ltd. The service providers may change their terms of service, the purpose and use of cookies, etc. at any time. The integration of third-party content always requires that they know the User's IP address, as without the IP address they cannot send the content to the User's browser. The IP address is therefore necessary for this content to be displayed. In addition, third-party content providers may set their own cookies and process Users' data for their own purposes. User profiles can be created from the processed data. We use this type of content as rarely as possible to prevent unwanted data transfers and choose third party providers that are trusted for data security.

The following list provides an overview of third party service providers and their content, as well as links to their privacy policies, which contain further information on data processing and, as in some cases already mentioned here, the possibility to object (the so-called "opt-out"):

- External Fonts from Google, Inc. <https://www.google.com/fonts> ("Google Fonts"). Google Fonts are integrated by calling Google's server (usually in the U.S.) Privacy: <https://policies.google.com/privacy?hl=en>, Opt-Out: <https://www.google.com/settings/ads/>.

- Maps from the "Google Maps" service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, a third party service provider. Privacy Policy: <https://policies.google.com/privacy?hl=en>, Opt-Out: <https://www.google.com/settings/ads/>.

- Videos from the "YouTube" platform of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, third party service provider. Privacy Policy: <https://policies.google.com/privacy?hl=en>, Opt-Out: <https://www.google.com/settings/ads/>.

8.8 Google Analytics

We use Google Analytics, a web analytics service provided by Google Inc ("Google"). Google uses cookies. The information generated by the cookie about your use of the website is usually transmitted to and stored by Google on servers in the United States of America.

Google will use this information on our behalf to evaluate your use of our website, compile reports on website activity for website operators and provide other services relating to website activity and internet usage. The processed data may be used to create pseudonymous user profiles.

We use Google Analytics only with IP anonymisation enabled. This means that the user's IP address will be shortened by Google within EU member states or other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States and shortened.

The IP address transmitted by the User's browser will not be merged with other Google data. Users can prevent the storage of cookies by configuring their browser software accordingly; Users can also prevent the collection of data generated by cookies and transmitted to Google for processing in connection with the use of online services by downloading and installing the browser add-on available at: <http://tools.google.com/dlpage/gaoptout>.A For more information on the use of Google data for advertising purposes, the options available and the opt-out options, please visit the Google website at: <https://www.google.com/intl/en/policies/privacy/partners> (How Google uses data from websites or applications that use our services), <https://policies.google.com/technologies/ads?hl=en> (How Google uses cookies in advertising), <http://www.google.de/settings/ads> (How Google controls the information it uses to serve ads) and <https://adssettings.google.com/authenticated?hl=en> (How Google personalises ads).

8.9 Social media tools

Our website uses social plug-ins (plug-ins) from various social networks such as Twitter, LinkedIn and YouTube, which are marked with their logos. When you access the site using these plugins, your browser data is transmitted to the owners of these social networks. This is how they are notified that you have accessed that website. If you are logged in to one or more of these social networks, this data may be linked to your account. Your IP address may be logged even if you are not a member of a social network or logged into one.

In this case, please note that the processing takes place outside the European Union. We have no control over, and accept no responsibility for, the amount of data transmitted via community plug-ins. For more information, please consult the data security policy of the network concerned:

twitter.com/privacy

<https://www.linkedin.com/legal/privacy-policy>

https://www.youtube.com/static?template=privacy_guidelines

8.10. Links to other websites

The website contains links to other websites. POSSESSIO Ltd. is not responsible for the privacy policies and/or practices of other websites and has no control over whether the operators of other websites act in accordance with the privacy provisions. This privacy and cookie policy applies solely to information collected on the www.possessio-ltd.eu website.