

# Privacy Policy

## Privacy Policy

### 1. Controller's name and contact details

Name of the data controller: H-Flue System LTD (hereinafter: Controller)

Mailing address: H-2100 Gödöllő, Veres Péter utca 33.

E-mail address: hluesystem@gmail.com

Telephone number: +36709414977

Website: <http://www.kemenyaruhas.unas.hu>

### 2. Statutory background, legal ground and purpose of data controlling performed on website, scope of the controlled data and duration of data controlling

#### 2/a) Information on the use of cookies

##### **What is cookie?**

During the visit of the website the Controller uses so called cookies. Cookie is an information package comprising of a case and figures which is sent to Your browser by our webpage in order to save certain of Your settings, facilitate the use of our website and enable us to collect some relevant statistic information on our visitors. Cookies do not contain any personal data, thus they are incapable of identifying individual users. Cookies often contain a unique identifier – an encrypted and random generated series of numbers – which will be stored on Your computer. Some of the cookies will cease to exist after closing the webpage, while others will be stored for a long time on Your computer.

##### **Statutory background and legal ground for cookies:**

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act) and act CVIII of 2001 on certain issues of electronic commerce services and information society services. In accordance with section 5 (1) a) of the Information Act the legal ground for the data control is provided by Your consent.

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

**Cookies strictly necessary for operation:** These cookies are strictly necessary in order to enable You to move around the website and to use its essential features. In the absence of such cookies several functions of the page will be unavailable for You. Their lifetime is restricted only for the duration of the session.

**Cookies used to enhance user experience:** These cookies collect information about the user's preferences, for instance what pages he/she visits most often and what kinds of error messages he/she receives from the webpage. Such cookies do not collect any information identifying the user, i.e. they operate with general and anonymous information. We use the data gained from such cookies to improve the performance of the website. Their lifetime is restricted only for the duration of the session.

**RTB customized retargeting cookies:** They may appear for previous visitors or users when browsing on other websites found on Google Display Network or searching for terms related to their products or services. Users of the website can omit the use of RTB technology by clicking on the following link: <http://adpilot.com/index.php?pid=privacy-opt-out>

If You disagree with the use of cookies, certain functions will be unavailable for You. Find more information about the deletion of cookies on the following links:

- Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-Your-computer>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

#### 2/b) Data control related to ordering and billing

##### **Statutory background and legal ground of data control:**

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act) and act C of 2000 on accounting (Accounting Act). In accordance with section 5 (1) a) of the Information Act the legal ground for the data control is provided by Your consent, or under section 6 (5) a) of the Information Act – in the case of withdrawal of Your consent - by compliance with the legal obligation set out in the Accounting Act to be fulfilled by the Controller.

##### **Purpose of the data control:**

Fulfillment of the obligation to issue bills compliant with laws and to retain the accounting document. Under section 169 (1)-(2) of the Accounting Act business associations shall retain the accounting documents for direct or indirect support of bookkeeping records.

##### **Scope of the data controlled:**

Name, address, e-mail address, phone number.

##### **Duration of the data control:**

Under section 169 (2) of the Accounting Act the issued bills shall be retained for 8 years of the date of issue. Please be advised that in case You withdraw Your consent granted to making out the bill, under section 6 (5) of the Information Act the Controller shall be entitled to retain Your personal data obtained while making out the bill.

#### 2/C) Data control related to the sale of products

##### **Statutory background and legal ground of data control:**

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act). In accordance with section 5 (1) a) of the Information Act the legal ground for the data control is provided by Your consent.

##### **Purpose of the data control:**

In the case of sale of products the purpose of the data control is to ensure that the ordered items are delivered for You in cooperation with contracted partners and in compliance with Your demands.

##### **Scope of the data controlled:**

Name, address, e-mail address, phone number.

##### **Duration of the data control:**

The Controller shall handle the personal data until the delivery of goods.

#### 2/D) Data control related to the dispatch of newsletters

##### **Statutory background and legal ground of data control:**

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act) and act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activity (Commercial Advert Act). In accordance with section 5 (1) a) of the Information Act and section 6 (1)-(2) of the Commercial Advert Act legal ground for the data control is provided by Your consent.

**Purpose of the data control:**

The purpose of the data control is to provide You with information about the latest, most favourable or special offers. Please be advised that we place not only the advertisements of the Controller in the newsletter but also those of other business associations, however, we shall not disclose or transfer Your personal data to them.

**Scope of the data controlled:**

Name, address, e-mail address, phone number.

**Duration of the data control:**

Until the withdrawal of the consent granted by the data subject.

**2/E) Data control related to the dispatch and display of customized advertisements**

**Statutory background and legal ground of data control:**

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act) and act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activity (Commercial Advert Act). In accordance with section 5 (1) a) of the Information Act and section 6 (1)-(2) of the Commercial Advert Act legal ground for the data control is provided by Your consent.

**Purpose of the data control:**

The purpose of the data control is to dispatch You customized offers that are in compliance with Your demands and preferences to the greatest possible extent.

**Scope of the data controlled:**

Browsing history.

**Duration of the data control:**

Until the withdrawal of the consent granted by the data subject.

**2/F) Data control accompanying the registration**

**Statutory background and legal ground of data control:**

The background of data control is laid down by act CXII of 2011 on informational self-determination and freedom of information (Information Act) and act V of 2013 on the Civil Code (Civil Code). In accordance with section 5 (1) a) of the Information Act the legal ground for the data control is provided by Your consent.

**Purpose of the data control:**

By storing the data provided during the registration the Controller will be able to provide more convenient services (e.g. the data subject shall not be required to provide his personal data again at the next shopping)

**Scope of the data controlled:**

During the data control the Controller shall handle Your name, address, phone number, e-mail address, properties of the purchased product and the date of purchase.

**Duration of the data control:**

Until the withdrawal of the consent granted by the data subject.

**Other data controls**

If the Controller intends to carry out further data control, then it shall provide information about the essential conditions of the data control (statutory background and legal grounds, purpose of the data control, scope of the controlled data, duration of the data control).

We advise You that the Controller shall fulfil the authorities' written request for the data supply founded on statutory authorization. In accordance with section 15 (2)-(3) of the Information Act the Data Controller shall keep records of data transferred (to which authority, what personal data, on what legal grounds and when the Controller transferred personal data) and provide information for the data subject unless it is precluded by law.

**3. Hiring data processors and their activity related to the data control**

**Data processing aiming at storing personal data**

**Data Processor's name:** UNAS Online Kft.

**Contact details:** Phone: +3699884000, E-mail: unas@unas.hu

The Data Processor shall perform the storing of personal data according to the written contract concluded with the Controller. The Data Processor shall not be entitled to control personal data.

**Data controlling activity related to the sale of goods**

**Data Processor's name:** DPD Hungária Kft.

**Contact details:** Phone: +3615016200, E-mail: dpd@dpd.hu

The Data Processor shall participate in the delivery of the ordered products under the contract concluded with the Controller. During this the Data Processor may control the customer's name, address and phone number until the ordered products are delivered, thereafter he shall delete the data without delay.

**Data security measures**

The Data Processor states that he has taken appropriate security measures in order to protect the personal data against unauthorised access, modification, transfer, disclosure, deletion or destruction, accidental destruction and damage as well as disabled access occurring due to changes to the technology applied.

**The rights of the data subject during the data control**

During the data control You shall have the right

- to request for information on the data control,
- correction,
- deletion,
- blocking of Your personal data and

- the right of objection.

Within the duration of the data control You may request the Controller to provide information on Your personal data controlled. The Controller shall inform You in clear form in writing of the data controlled, purpose, legal grounds and duration of the data control, or – in the case of data transfer – of the recipients of the data, purpose of the transfers within the shortest possible time following the submission of the request; however, not later than within 25 days.

Within the duration of the data control You may request the Controller to correct Your personal data. The Controller shall fulfil Your request not later than within 15 days.

Within the duration of the data control You may request the Controller to delete Your personal data, which the Controller shall fulfil not later than within 15 days. The right to deletion shall not be exercised if the Controller is obliged to continue the storing of the data either by law or in accordance with 6 (5) of the Information Act he is entitled to do so (for instance, in relation to billing).

You may request the Controller to block Your personal data if You presume that the deletion would violate Your lawful interests. Personal data blocked through such means may exclusively be controlled while the control objective remains valid which bars the deletion of the personal data.

You may object to controlling Your personal data if

- the personal data must be controlled or transferred to fulfil the legal obligations of the Controller, or to enforce the lawful interests of the Controller, data recipient or third party, except for cases of mandatory data control and for case under section 6 (5) of the Information Act;
- the personal data are used or transferred directly for business benefits, public opinion surveys or scientific research purposes, without Your consent.

The Controller shall assess the objection within the shortest possible time limit following the submission of the request but not later than within 15 days and shall make a decision on the grounds of the objection and shall notify the applicant of the decision in writing. If the Controller does not fulfil the data subject's request for correction, blocking or deletion, he shall notify the data subject in writing or – with the consent of the data subject – electronically of the factual and legal reasons for the rejection of the request for the correction, blocking or deletion within 25 days following the receipt of the request.

#### **Remedies**

If You believe that the Controller has violated any statutory provision pursuant to data control, or if he has refused to fulfil any of Your requests, then You can initiate the proceedings of the National Authority for Data Protection and Freedom of Information (mailing address: 1530 Budapest, Pf.: 5., E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) for the termination of the supposed unlawful data control.

We also advise You that in the case of violation of statutory provisions relating to the data control, or if the Controller has not fulfilled any of Your requests, then You may initiate judicial proceedings against the Controller.

#### **Application for the entry into the data protection register**

Under the provisions of the Information Act the Controller shall submit reports in the data protection register.

#### **Data protection registration number:**

#### **Amendment to the privacy policy**

The Controller reserves the right to amend this privacy policy. By using the website following the amendment thereof You shall accept the amended privacy policy. The Controller shall ensure that in the case of amendment the previous version is also available on the website.