

Privacy Policy

1. Introduction, Data Controller's data and contacts
2. Scope of the Policy (relating to data submitted in shops and/or online, right to modification)
 - 2.1. Scope of the Policy
 - 2.1.1. Duration
 - 2.1.2. Scope ratione personae
 - 2.1.3. Material scope
 - 2.2. Data submitted in shop or online
 - 2.3. Right to modification
3. Relevant legal application
4. Relevant legislation
5. Definitions
 - 5.1. Personal data
 - 5.2. Data processing
 - 5.3. Data controller
 - 5.4. Data processor
 - 5.5. File
 - 5.6. Recipient
 - 5.7. Consent
 - 5.8. Third parties
 - 5.9. Personal data breach
 - 5.10. Partner
 - 5.11. Associate
 - 5.12. Web site
 - 5.13. Social media site
6. Principles (ambition, accuracy, ect.)
 - 6.1. Legality, fair trial and transparency
 - 6.2. Ambition
 - 6.3. Data minimisation
 - 6.4. Precision
 - 6.5. Limited conservation
 - 6.6. Integrity and trust
 - 6.7. Accountability
7. Rights of the data subjects (cancellation, erasure, objection, ect.)
 - 7.1. Right of access by the data subject
 - 7.2. Right to rectification
 - 7.3. Right to erasure
 - 7.4. Right to restrict data processing
 - 7.5. Procedural rules
 - 7.6. Right to data portability
 - 7.7. Right to object
 - 7.8. Automated decision making in unique cases, including profiling
8. The principles of secure data processing
9. Data processing relating to the management of the Company
10. Newsletter, Direct Marketing activity, registration on the website
 - 10.1. Newsletter and Direct Marketing
11. The names of the data processors

12. Cookie
- 12.1. What is a cookie?
- 12.2. Types of cookies
13. Google Adwords
14. Google Analytics
15. Using social media
16. Complaint handling
17. Supervisory Authority
18. Disclaimer

1. Introduction, the data controller's data and contacts

Pursuant to REGULATION 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL of 27 April 2016 that revoked Regulation 95/46/EC of 24 October 1995 (General Data Protection as well as to the protection of individuals with regard to the processing of personal data and the free movement of such data, we provide the following information.

THE DATA CONTROLLER AND ITS CONTACTS:

Name of the company: Oxygeni Hair Kft.

Office: 2040 Budaörs, Kecsekő utca 8.

VAT registration number: 27038905-2-13

E-mail: info@oxygenihair.com

Phone: +36 70 366 0277

The Data Controller (hereinafter "Controller") shall endeavour to adhere to the recommendations of the National Authority for Data Protection and Freedom of Information – especially the recommendation of 29 September 2015 on preliminary information on data protection circumstances –, using therefore concise language in elaborating on data protection regulations, complementing them with examples where necessary, and presenting in detail data protection activities to allow the subjects to make a conscious decision, regardless of whether to consent to such use or not.

Should you choose to reach out to our Company, use the contact details provided in this document and on our website to get in touch with your Controller.

The Company deletes all e-mails along with the sender's name, address, data regarding appointments, and other personal data provided in the e-mail after a period of five years from the date of data processing. Any data processing matter not specifically detailed in this document shall be communicated at the time of registration.

The Controller may be contacted by courts, public ministers, investigation authorities, prosecution authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, or any legally authorised organisation with requests for information, data disclosure, data transmission, or access to documents.

Provided that the authorities defined the scope of the request and the data required, the Company shall submit only the amount of personal information deemed indispensable for the realisation of said request.

2. Scope of the Policy (relating to data submitted in shops and/or online, right to modification)

2.1. Scope of the Policy

2.1.1. Duration:

This Policy is effective from 25 May 2018 until further notice or revocation.

2.1.2. Scope *ratione personae*

The Scope *ratione personae* of this Policy applies to:

- The Controller,
- Persons whose data are processed under this Policy,
- Persons whose rights and interests are affected by the data processing, - The Controller who primarily processes the data of those natural persons who contacted the Controller to establish a relationship, used or requested its services, or who contacted the Controller for a reason that falls outside the scope of the relationship, using electronic means, such as sending data to any of the Controller's e mail addresses, via social media, telephone, or in person.
- The Controller's associates
- The Controller's natural person partners, the representatives of non-natural person partners, contacts, or other associates.

2.1.3. Material scope

The scope of this Policy applies to all personal data processing conducted by any of the Controller's department, regardless of whether they are carried out in electronic or paper format. In the case of paper-based processing, the Controller shall also establish and operate a formally separate archiving policy different from this Policy, which supplements its general provisions, and which are subject, and shall therefore be considered an annex to this Policy.

2.2. Data submitted in stores / online

This Policy applies to the processing of personal data submitted, along with the request for services, via the Company's online portal (info@oxygenihair.com) or at the Company's office/regional centres/other institutions.

2.3. Right to modification

The Company reserves the right to change this guide at any time. Partners shall be notified of eventual changes in due time. Modifications shall enter into force on the date of their publication on the Company's website. In case of questions that cannot be answered by this guide, those concerned are invited to write us an e-mail, and so one of our colleagues will provide the necessary clarifications. The Company is committed to providing services of the highest quality but shall not assume any responsibility for damages arising from the use of the

system.

3. Application of relevant legislation

Any legal disputes relating to the Company and its services falls under jurisdiction of the Hungarian courts on the basis of Hungarian legislation.

4. Relevant legislation

The Company's principles of data processing are in line the with effective legislation on data protection, in particular:

Act CLV of 1997 on Consumer Protection (the "Consumer Protection Act");

Act XIX of 1998 on Criminal Proceedings;

Act C of 2000 on Accounting;

Act CVIII of 2001 on Electronic Commerce and on Information Society Services;

Act C of 2003 on Electronic Communications

Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (Security Services Act);

Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity;

Act CXII of 2011 on the Right to Informational Self-determination and Freedom of Informaton;

Act CLIX of 2012 on Postal Services;

Act V of 2013 on the Civil Code, Directive 679/2016 of the European Parliament and Council (GDPR).

5. Deifinition

5.1. Personal data:

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.

5.2. Data Processing:

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.

5.3. Data Controller:

A 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, takes and executes, either personally or through an authorized data processor, decisions concerning the processing of data. Thus, the Data Controller, within the context of this Policy, is the persons defined in Chapter 1.

5.4. Data processor:

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

5.5. File:

A set of data stored in a registry.

5.6. Recipient:

A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

5.7.

Consent

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. Consent therefore has three basic conditions: willingness, determination, awareness.

5.8.

Third party:

A natural or legal person, public authority, agency or body other than the data subject, controller, processor.

5.9.

Personal data breach

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.

5.10.

Partner

Legal persons using the services of the Data Controller under contract and/or facilitating the services of the Controller (fulfilment partner), business associations without legal entity to which the Controller – with the consent of the data subject – shall or may transmit personal data, or which shall or may carry out activities facilitating data storage, data processing, relevant IT and other, secure data handling activities for the Controller.

5.11.

Associate

A natural person in legal relationship with the Controller who is entrusted with providing or performing the services of the Controller and encounters personal data during his or her handling or processing tasks and in relation to whose activities the Controller is or may be fully liable to the data subjects and third parties.

5.12.

Website

A portal and all its pages operated by the Controller.

5.13.

Social media site

A page related to the content of a webpage on the portal and operated by the Controller.

6. Principles (ambition, accuracy, ect.)

6.1. Lawfulness, Fairness and Transparency:

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

6.2.

Purpose limitation

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes.

6.3.

Data minimisation

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6.4.

Accuracy

Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

6.5.

Storage limitation

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject.

6.6.

Integrity and Confidentiality

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6.7.

Accountability

The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1.

7. Rights of the data subjects (cancellation, erasure, objection, ect.)

The data subject may request information on the processing of his or her personal data, or request the rectification – with the exception of data processing prescribed by law –, cancellation or closure of his or her personal data by submitting a completed, specific application form.

7.1.

Right of access by the data subject

Upon the data subject's request the data controller shall provide information concerning the data relating to him, including those processed by a data processor on its behalf or according to his or her notice, the sources from where they were obtained, the purpose, grounds and duration of processing, the name and address of the data processor and on its activities relating to data processing, and - if the personal data of the data subject is made available to

others - the legal basis and the recipients.

The Company shall provide the information requested in an intelligible form, in writing at the data subject's request, within not more than twenty-five days. The information shall be provided free of charge for any category of data once a year. Additional information concerning the same category of data may be subject to a charge.

The Company may refuse to provide information to the data subject only in cases defined by law. Should a request for information be denied, the Company shall inform the data subject in writing that the refusal occurred in compliance with the "Privacy Act" of 2011. Where information is refused, the Company shall inform the data subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information.

7.2.

Right to rectification

Where a personal data is deemed inaccurate, and the correct personal data is at the controller's disposal, the data controller shall rectify the personal data in question.7.3.

Right to erasure ('right to be forgotten')

Personal data shall be erased if:

- a) processed unlawfully
- b) so requested by the data subject (provided that erasure is not disallowed by statutory provision of an act);
- c) the purpose of processing no longer exists or the legal time limit for storage has expired (with the exception of personal data recorded on a carrier that is to be deposited in archive under the legislation on the protection of archive materials).
- d) so ordered by court or by the Authority.

Personal data is unlawful if:

- a) incomplete or inaccurate and it cannot be lawfully rectified, provided that erasure is not disallowed by statutory provision of an act;
- b) the purpose of processing no longer exists or the legal time limit for storage has expired;
- c) so ordered by court or by the Authority.
- d) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- e) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;

Limitations to data erasure:

- a) exercising the right of freedom of expression and information;

- b) legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) of Regulation 679/2016 of the European Union in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

7.4. Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d. the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. A data subject who has obtained restriction of processing shall be informed by the Controller before the restriction of processing is lifted.

7.5. Procedural rules

The Controller shall communicate any rectification or erasure of personal data or restriction of processing within not more than 25 (twenty five) days. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the Controller does not take action on the request for rectification, closure or erasure of the data subject, the controller shall inform the data subject in writing or, with his or her consent, by electronic means about the reasons of refusal within not more than 25 (twenty five) days. Where information is refused, the Company shall inform the data subject of the possibilities for seeking judicial remedy or lodging a complaint with the National Authority for Data Protection and Freedom of Information. In the event of any infringement of his or her rights, the data subject may turn to court action. The burden of proof to show compliance with the law lies with the Controller. The action shall be heard by the competent tribunal. If so requested by the data subject, the action may be brought before the tribunal in whose jurisdiction the data subject's home address or temporary residence is located) When a data is rectified, blocked, marked or erased, the data subject and all recipients to whom it was transmitted for processing shall be notified. Notification is not required if it does not violate the rightful interest of the data subject in light of the purpose of processing.

7.6. Right to data portability

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

7.7. Right to object

The data subject shall have the right to object to the processing of data relating to him if:

- a) processing or disclosure is carried out solely for the purpose of discharging the 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;
- b) personal data is used or disclosed for the purposes of direct marketing, public opinion polling or scientific research; and
- c) in all other cases prescribed by law.

The Company shall investigate the cause of objection within the shortest possible time inside a fifteen-day time period, adopt a decision as to merits and shall notify the data subject in writing of its decision. If, according to the findings of the Controller, the data subject's objection is justified, the controller shall terminate all processing operations (including data collection and transmission), block the data involved and notify all recipients to whom any of these data had previously been transferred concerning the objection and the ensuing measures, upon which these recipients shall also take measures regarding the enforcement of the objection.

7.8. Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This right shall not apply if the decision is necessary for entering into, or performance of, a contract between the data subject and a data controller

is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or is based on the data subject's explicit consent.

8. Security principles of data processing

The Company shall select and operate the information technology tools used for the processing of personal data during the implementation of services in a manner that the processed data is:

- a) available to authorised users ("availability")
- b) ensured in terms of authenticity and authentication ("authenticity of data processing")
- c) proven as invariable ("data integrity")
- d) protected against unauthorized access ("data confidentiality").

The Company shall implement adequate safeguards and appropriate technical and organizational measures to protect personal data.

During the data processing the Company preserves:

- a) confidentiality: protecting information against unauthorised users;
- b) integrity: protecting the accuracy and integrity of information and the method of data processing
- c) availability: ensuring access and means for an authorised user to the information he or she needs.

The Company's computer system and network are both protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, breaches, and Denial-of-service attacks. The operator implements server and application-level preventive measures to ensure security.

Data subjects are advised that electronic messages transferred via internet are vulnerable to network attacks leading to unlawful activities, contract disputes, illegal disclosure or alteration of information. The company shall seek to implement any preventive measure to ensure protection against such attacks. The Company shall monitor the systems to record any security anomalies and provide evidence for any security incident. Monitoring the system also allows the effectiveness of preventive measures implemented to be controlled.

9. Data processing concerning the operation of the Company

The number of data subjects in the chart is reduced or expanded depending on the services provided by the Company. Data subjects Processed data Purpose of data processing Legal basis of data processing

Employment Act CXII of 2011 Administration concerning employees. "Privacy Act", Act I of 2012, Act CL of 2017, the consent of the data subject.

Partners and sponsors Collaboration among the Company and its partners, sponsors, establishing and facilitating contact. Act CXII of 2011 "Privacy Act", Act CLXIV of 2015, as well as the consent of the data subject.

Clients The purpose of data processing is to provide adequate information and offer to the data subject, maintain contact, facilitate complaint submission, identify the complaint, as well as to assume responsibilities prescribed by law and register obligatory data.

Act CXII of 2011 “Privacy Act” and the consent of the data subject. The purpose of data processing related to the distribution of newsletters is to provide general or customised information on up-to-date events, news, changes in and postponement of services of the Controller. Act CXII of 2011 “Privacy Act”, Act CVIII of 2001, as well as the consent of the data subject.

10. Newsletter, Direct Marketing activities, Registration on the website

10.1. Newsletter and Direct Marketing

Pursuant to Section 6 of Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity, the data subject may give prior and explicit consent to receiving advertising offers and other messages from the Company via the contact details provided upon registration.

The data subject may also give consent to allow the Company to process his or her personal data needed for the distribution of advertising offers, bearing in mind the directives of this guide. The Company shall not send unwanted adverts; the data subject may unsubscribe free of charge from receiving advertising offers without any limitation of justification. In such case, the Company shall erase all personal data about data subject necessary for the distribution of adverts from the registry and shall not send any more advertising offers to the data subject. The data subject may unsubscribe bay way of clicking on the link in the Newsletter.

The numbers of data subjects: All data subjects subscribed to the Newsletter. The purpose of the data processing: sending electronic messages containing advertising material (e-mail, sms, push message) to the data subject, divulgating information on up-to-date occurrences, services, and new functions. The duration of the data processing, the deadline of data erasure: data processing shall last until the withdrawal of consent (unsubscribing).

The withdrawal of consent to the transfer of direct marketing messages and the erasure or modification of personal data may be requested by contacting:

- by email: info@oxygenihar.com, and
- by post: 2040 Budaörs, Kecskékó utca 8.

11. The name of the Data Processor

Information regarding the Data processor and data processing

The legal basis of data processing

Carrier The duration of data processing, data and User

12. Cookie

12.1. What are cookies?

A cookie is a small text file that a website stores on the user's computer or mobile device when he or she visits the site for a determined period of time and purpose.

During repeated visits, they enable the website to recognise the text file and identify the previous visitor. The deadline of erasure, arranging deliveries, consent, Act CXII of 2011, Online payment organization.

Processed data: name, e-mail address. The purpose of data processing is to execute and confirm transactions and conduct fraud monitoring in the interest of the users. Duration of data processing, Deadline of data erasure: execution of online payments.

Consent of the data subject, Act CXII of 2011, Act CVIII of 2001.

Hosting operator

The purpose of data processing is to ensure the availability and correct functioning of the website. Data processing is terminated with the cancellation of registration.

Consent of data subject, Act CXII of 2011, Act CVII of 2001, Mail Chip Accountant Legal representative

The primary function of cookies is to ensure a convenient and customised experience for the user as they store various personal data and settings. Cookies may also be used to realise targeted, personalised advertising campaigns.

The website, pursuant to Section 155 (4) of Act C of 2003 which states "data may be stored or accessed on the electronic communication terminal equipment of the subscriber or user only with his or her consent in view of clear and complete information which is in line with the purpose of data processing", provides the following information regarding the analytic tools, i.e. cookies used.

The Company's website was created, using the portal whose engine is being used by the website.

The portal and the pages created with the portal use cookies defined as follows, but the Controller may not use these cookies independently in any way. The cookies used may communicate between the device of the data subject and the portal, but may not transfer or hand over any data to the Controller; therefore, in the context of the cookies used, the portal's own privacy policy shall prevail.

12.2. Types of cookies

The cookies used on the Company's website may be put into four categories in accordance with classification of the International Chamber of Commerce: strictly necessary cookies, performance cookies, functionality cookies, targeting cookies or advertising cookies.

Types

Category 1: strictly necessary cookies

These cookies are essential in order to enable the user to move around the website and use its features. Without these cookies services searched for on the Company's website, such as accessing secure areas of the website, cannot be provided. While browsing the Company's website identifies the user by using cookies containing an encrypted chain of characters. Each time the user visits the website, the Company shall install a unique identifier onto his or her the device. For instance: session cookies are essential for the functioning of the website, so they cannot be disabled. The user is advised to stop using the Company's website if the he or she prefers not having these cookies downloaded in his or her browser.

Category 2: performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the Company's website works. For instance: has_js cdrop. Cookies that collect data on the performance of the website may be disabled or deleted in the browser settings. For more information click here. The operator of the Company's website uses Google Analytics to draw up a statistical analysis on user behaviour. Despite the information transferred to third parties does not contain personal data, in some cases browsing data may be used to track data subjects.

3. Category 3: functionality cookies

These cookies allow the website to remember the name or the language preference of the user. For instance, a website may be able to provide you with local news by storing in a cookie the region in which the user is currently located. These cookies can also be used to remember changes made to text size other similar settings. The information these cookies collect are anonymous. The information they store cannot be used to track the user. For instance: Drupal.tableDrag.showWeight Drupal.toolbar.collapsed. Cookies that store personal settings may be disabled or deleted in the browser settings. For more information click here. The functions of the Company's website and user experience are affected by the disablement of this type of cookies.

Category 4: targeting cookies or advertising cookies

These cookies are used to deliver adverts more relevant to the interests of the user.

The operator of the Company's website uses Google Adwords and other advertising systems to derliver online adverts. These service providers may store user IP addresses and other identifier information not qualified as personal data to later deliver the Company's adverts on external websites. For instance: id, RSMKTO1, mkto_trk, utma, utmb, utmc, utmz. Read more on the disablement or deletion of cookies serving webanalytics and advertising puproses.

13. Google Adwords

This Controller uses the online advertising program "Google AdWords" and in the context of Google AdWords the conversion tracking services of Google LLC. Google conversion tracking is an analyser service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When the data subject accesses a website through a Google advert, a cookie used for conversion tracking is installed on the computer. These cookies have a limited validity period, do not contain any personal data, so the data subject cannot be identified by them. When the data subject is browsing certain pages of a website, and the cookie is not yet expired, both Google and the Controller may see the data subject has clicked on the advert.

Each Google AdWords data subject receives a different cookie, so they cannot be tracked via websites of AdWords. Information obtained by conversion-tracking cookies are used to draw up conversion statistics for data subjects opting for AdWords conversion tracking. This is the means whereby information is obtained on the targeted data subjects clicking on their adverts and transferred to another site bearing a conversion-tracking tag. They do not access information with which any data subject could be identified. Should the user refuse to participate in conversion tracking, he or she may disable the possibility to install these cookies. After this the user shall not be included in conversion-tracking statistics.

More information on this as well as Google's Privacy Policy can be found on the following page: www.google.de/policies/privacy/

14. Google Analytics

This website uses Google Analytics, a service provided by Google Inc. ("Google") web analytics service. Google Analytics uses so-called "cookies", text files placed on the users' computer, to help the website analyse how users use the site. The information generated by cookies concerning the use of the website are usually transmitted to and stored by Google on servers in the United States. If IP anonymisation is activated on this website, the IP address of the user will be shortened first by Google within the member states of the European Union or in other contractual states of the Convention on the European Economic Community.

Only in exceptional cases shall the full IP address be transferred to a Google server in the USA and shortened there. Google shall use this information to evaluate the users' use of the website, compile reports on website activity for website operators and provide other services relating to website activity and internet usage.

Google Analytics shall not confuse the user's IP address transmitted by the browser with other Google data. The user may prevent cookies from being stored on his or her computer by adjusting the relevant browser settings. This however may result in the user's inability to use all the features of this website to their full extent.

The user may also prevent the data produced by cookies relating to his or her use of the websites from being collected (including IP addresses) and processed by Google by

downloading and installing the browser add-on available on the following link:
<https://tools.google.com/dlpage/gaoptout?hl=hu>

15. The use of social media sites

Pursuant to Section 20 (4) of Act CXII of 2011 on the Right to informational self determination and freedom of information, the following subpoints need to be defined within the context of data processing of social media sites:

- a) an indication of the fact that data is being collected;
- b) the data subjects targeted;
- c) the purpose of data collection;
- d) the duration of the proposed processing operation;
- e) the potential data controllers with the right of access;
- f) the right of data subjects and remedies available relating to data processing

An indication of the fact that data is being collected, the data subjects targeted, Facebook/Google+/Twitter/Pinterest/Youtube/Instagram, ect. Name and public profile picture registered on social media sites. The data subjects targeted: Natural persons who voluntarily follow, share, or like content on the social media sites of the Controller, in particular on facebook.com.

The purpose of data collection: The act of sharing, “liking”, and promotion of certain content, products, or discounts of the website on social media sites.

The duration the proposed processing operation, the deadline of data erasure, the identity of prospective controllers entitled to access data and information on the rights relating to data processing of data subjects: The data subject may acquire information on the source, processing, method of transmission, and legal basis of the data on that social media site. Data processing takes place on the social media site. The policy of that website shall apply to the duration and method of data processing and the possibility to erase and modify data.

The legal basis of data processing: The consent of the data subject to the processing of his or her data on social media sites.

The Company can be found on Facebook and other social media sites. Voluntary consent shall form the basis for the use of social media sites (in particular Facebook), establishing and maintaining contact with the Controller through, or any other operation permitted on social media sites.

The Controller may contact the data subject, and the purpose of the data gains significance, only if the data subject has contacted the Controller through the social media sites. The purpose of expanding the Company’s presence to social media sites (in particular Facebook) and that of relevant data is to share, publish and market the content of the website on social

media platforms where data subjects can find information about the newest discounts.

The data subject gives his or her consent in accordance with the terms and conditions of that social media site by following and liking the content of the Controller. On Facebook the data subject may subscribe to the newsfeed situated on his or her message board by clicking on the “like” link, effectively giving his or her consent to the publishing of news and offers from the Controller on his or her message board. In the same place the data subject may also unsubscribe by clicking on the “dislike” link or delete unwanted newsfeed elements appearing on his or her message board in Settings.

Where made possible, the data subject may rate the Controller by means of a numerical scale or written description. The Controller may also publish pictures and videos of different events, the services provided by the Controller, ect. The Controller may connect Facebook to other social media sites in compliance with the policies of facebook.com, so any material published on facebook.com may also appear on other, similar portals.

Pursuant to Penal Code 2:48, unless the footage features crowds or public figures, the Controller must seek the written consent of the data subject prior to publishing the pictures. The data subject can acquire information about the processing of his or her data on that particular social media site through the same platform. The duration of data processing: to the date of the data subject’s request of cancellation.

16. Complaint handling

Compensation and compensation for damage to reputation

The Company shall compensate for any damage arising from unlawful handling of the data subject’s data or damage caused to a third party by breaching data security requirements. Pursuant to Penal Code 2:52, In the event of invasion of his or her privacy the data subject may request compensation for damage to reputation.

The Company shall be responsible for the damage caused by the Controller. The Company shall be exempted from liability if it can prove that the damage or violation was caused by an unavoidable force outside the scope of data processing.

The Company shall not compensate for damages if the damage was caused by the injured party and compensation for damages to reputation may not be requested if the violation of privacy was caused by the intentional or severely reckless behaviour of the data subject.

Complaint submitted to the Data Protection Officer:

Should you have any issues or questions regarding the Company’s data processing, please contact our Data Protection officer.

Data Protection Authority proceedings:

Complaints are to be submitted to the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Postal address: 1530 Budapest, Pf.: 5.

Phone: 06.1.391.1400 Fax: 06.1.391.1410

E-mail: ugyfelszolgalat@naih.hu

Home page: <http://www.naih.hu>

17. Supervisory authority

For legal remedies and complaints contact the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Office: 1125 Budapest Szilágyi Erzsébet fasor 22/c.

Postacím: 1530 Budapest, Pf.: 5.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Home page: <http://naih.hu>

18. Disclaimer

The Company shall publish information and documents for general information purposes only. All trademarks, logos, available information, and other materials shown on the website are protected by copyright; all related rights belong to the Controller.

All trademarks shown on the website are protected. Without explicit consent third parties may not, in any way or legal basis, use, copy, propagate or disclose them. It is prohibited to post links leading to any other website without prior, written consent. Unlawful use may carry legal consequences as defined by copyright, civil and penal law.

The data subject may use this information in original format and for personal use only (download, print). This permit allows to handle and archive exclusively original copies of the website.

The Company shall not be held liable for the accuracy, reliability and content of the website shown on the screen of the data subject, unless otherwise provided by the Law.

The Company reserves the right to modify and cancel contents shown on the website. The Company does not guarantee fluent and error-free access to the website. The Company shall not be liable for damages or losses arising from the user's accessing or directly or indirectly using the website, information and documents contained therein, inadequate state or functioning, shortages, eventual malfunctions, or ambiguity of the homepage. The Company shall not be liable for materials created, transmitted or published by third parties which relate or refer to the Company's website.

If the data subject makes available written material to the Company, the data subject thereby acknowledges that the material may be disclosed and accepts that the Company may publish or use its content either wholly or in part with the correct citation of the authorship without any liability. With this the data subject also admits that the document or content made available to the Company does not undermine copyright or any other rights of third parties relating to the data subject and shall not initiate legal proceedings against the Company, impose any demand or claim relating to these rights, and in the event of a claim from third parties shall reimburse the Company.

The Company may also make decisions different from the present provisions in compliance with the legislation in force; thus the understanding and acceptance of current regulations and terms and conditions are a prerequisite for accessing certain services.

This policy is considered a copyrighted work. It is prohibited to copy, reproduce, distribute, publish, or in any way distort, curtail, wholly or in part use, process, or sell without the written consent of the author. The Controller is the author of this policy.