

## **Privacy notice**

### **Introduction:**

Ferenc Kubicsek, sole proprietor (registered office: 9400 Sopron, Schönherr-malom utca 27., tax number: 91260378-1-28, hereinafter referred to as "Service Provider" or "Data Controller") is subject to the following policy. Pursuant to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation), we provide the following information.

This Privacy Policy applies to the website available at the domain <https://www.kubicsekweblapok.hu>, all of its subdomains, as well as websites operated by the data controller under domain names with different extensions (such as .com) that feature the same or similar content.

The privacy policy is available on the following page:  
<https://www.kubicsekweblapok.hu/en/privacy-notice/>

Amendments to the Rules will enter into force upon publication at the above address.

### **Data of the Service Provider as data controller:**

The name of the provider's website: <https://www.kubicsekweblapok.hu>.

Name of the service provider: Ferenc Kubicsek sole proprietor

The service provider is located at Schönherr-malom utca 27, 9400 Sopron, Hungary.

VAT number: 91260378-1-28

The contact details of the service provider, the e-mail address regularly used to contact the users: [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu)

The postal address of the service provider is: 9400 Sopron, Schönherr-malom utca 27.

Phone number: +36 31 788-9580

Name of the registering authority: National Tax and Customs Administration

### **Definitions:**

"personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"processing" means any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

"controller" means a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the controller's designation may also be determined by Union or Member State law;

"processor" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

"recipient" means a natural or legal person, public authority, agency or any other body to whom or with which personal data are disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

"the data subject's consent" means a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;

"data breach" means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

### **Principles governing the processing of personal data:**

Personal data:

(a) be processed lawfully and fairly and in a transparent manner for the data subject ("lawfulness, fairness and transparency");

(b) be collected only for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes shall not be considered incompatible with the original purpose in accordance with paragraph 1 of this Article ('purpose limitation');

(c) be adequate, relevant and limited to what is necessary for the purposes for which the data are processed ("data minimisation");

(d) be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes of the processing are erased or rectified without undue delay ("accuracy");

(e) 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 kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with paragraph 1 of this Article, subject to the implementation of appropriate technical and organisational measures as provided for in this Regulation to safeguard the rights and freedoms of data subjects ('limited storage');

(f) be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("integrity and confidentiality"), by implementing appropriate technical or organisational measures.

The controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability"). The controller declares that its processing is in accordance with the principles set out in this point.

#### **Data management: registration:**

The fact of data collection, the scope of data processed and the purposes of data processing:

Purpose of the processing:

- Necessary for contacting, making a purchase and for proper invoicing.
- Keep in touch, send confirmations
- Keeping in touch, coordinating billing or delivery issues more efficiently.
- Issuing proper invoices and creating, defining, amending, monitoring the performance of the contract, invoicing the resulting fees and enforcing the related claims.
- Managing order and delivery information

Personal data:

- Surname and first name
- E-mail address
- Telephone number
- Billing name and address
- Note to order
- Date of purchase/registration
- IP address at the time of purchase/registration

The e-mail address does not need to contain any personal data.

Data subjects: all persons registered on the website, customers.

Duration of data processing, deadline for deletion of data: until the data subject's request for deletion. The controller will inform the data subject electronically of the erasure of any personal data provided by the data subject pursuant to Article 19 of the GDPR. If the data subject's request for erasure also includes the e-mail address provided by the data subject, the controller will also erase the e-mail address following the notification. Except in the case of accounting records, since pursuant to Article 169 (2) of Act C of 2000 on Accounting, these data must be kept for 8 years.

The accounting documents (including general ledger accounts, analytical or detailed records) directly and indirectly supporting the accounting accounts must be kept for at least 8 years in a legible form, retrievable by reference to the accounting records.

Potential controllers of the data, recipients of the personal data: personal data may be processed by the data controller's customer service representative, in compliance with the above principles.

Description of data subjects' rights in relation to data processing:

The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and the data subject shall have the right to data portability and to withdraw consent at any time.

The data subject may request access to, deletion, modification or restriction of processing of personal data, or the portability of data in the following ways:

by post to 9400 Sopron, Schönherr-malom utca 27,

by e-mail to [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu) by e-mail,

by phone on +36 31 788-9580.

Legal basis for processing:

- Article 6(1)(b) GDPR,
- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services (hereinafter: Elker Act): the service provider may process personal data that are technically indispensable for the provision of the service. The service provider must, other conditions being equal, choose and in any case operate the means used in the provision of the information society service in such a way that personal data are processed only if absolutely necessary for the provision of the service and for the fulfilment of the other purposes specified in this Act, but in this case only to the extent and for the duration necessary.
- Article 6(1)(c) if the invoice is issued in accordance with accounting legislation.

● In the case of enforcement of claims arising from a contract, 5 years pursuant to § 6:21 of Act V of 2013 on the Civil Code (2013) § 6:22 [Limitation] (1) Unless otherwise provided by this Act, claims shall be time-barred after five years. (2) The limitation period shall begin to run when the claim becomes due. (3) An agreement to change the limitation period shall be in writing. (4) An agreement excluding the limitation period shall be null and void.

Please note that:

- the processing is necessary for the performance of a contract and the provision of a quotation.
- you are required to provide personal data in order for us to provide our services.
- failure to provide the data will result in us not being able to provide you with the service.

**Contact us:**

The fact of collection, the scope of the data processed and the purpose of the processing:

Purpose of the processing:

- Identification
- Keep in touch, send reply messages
- Perform the technical operation required to respond

Personal data:

- Name
- E-mail address
- Message content
- Date of contact
- The IP address at the time of contact

The e-mail address does not need to contain any personal data.

Data subjects: all data subjects who send a message via the contact form.

Duration of data processing, deadline for deletion of data: until the data subject's request for deletion.

Identity of potential controllers of the data, recipients of the personal data: personal data may be processed by the customer service staff of the controller.

Description of data subjects' rights in relation to data processing:

The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and

the data subject has the right to data portability and the right to withdraw consent at any time.

The data subject may request access to, deletion, modification or restriction of processing of personal data, or the portability of data in the following ways:

by post to 9400 Sopron, Schönherr-malom utca 27,

by e-mail to [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu) by e-mail,

by phone on +36 31 788-9580.

Legal basis for processing: consent of the data subject, Article 6(1)(a) and (b).

Please note that:

- the present processing is based on your consent and is necessary for the contact.
- you are required to provide personal data in order to contact us.
- failure to provide the data will result in you being unable to contact the Service Provider.

#### **Customer relationship:**

The fact of collection, the scope of the data processed and the purpose of the processing:

Purpose of the processing:

- Keeping in touch
- Identification
- Performance of contracts
- Business purpose

Personal data:

- Name
- E-mail address
- Telephone number

Data subjects: all data subjects in contact with the data controller by telephone/e-mail/in person or in a contractual relationship.

Duration of data processing, deadline for deletion of data: data processing lasts until the termination of the legal relationship between the data controller and the data subject or, in the case of claims, for 5 years after the contract.

Potential controllers of the data, recipients of the personal data: personal data may be processed by the customer service staff of the controller, in compliance with the above principles.

Description of data subjects' rights in relation to data processing:

The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and

the data subject has the right to data portability and the right to withdraw consent at any time.

The data subject may request access to, deletion, modification or restriction of processing of personal data, or the portability of data in the following ways:

by post to 9400 Sopron, Schönherr-malom utca 27,

by e-mail to [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu) by e-mail,

by phone on +36 31 788-9580.

Legal basis for processing:

- Article 6(1)(b) and (c) of the GDPR.

- In the case of enforcement of claims arising from a contract, 5 years pursuant to § 6:21 of Act V of 2013 on the Civil Code (2013) § 6:22 [Limitation] (1) Unless otherwise provided by this Act, claims shall be time-barred after five years. (2) The limitation period shall begin to run when the claim becomes due. (3) An agreement to change the limitation period shall be in writing. (4) An agreement excluding the limitation period shall be null and void.

Please note that:

- the processing is necessary for the performance of a contract and for the maintenance of the relationship.

- you must provide personal data so that we can fulfil your order/other request.

- failure to provide the data will result in our inability to process your order/request.

#### **The data processors used: hosting providers**

Activity performed by the data processors: hosting

Name and contact details of the data processors:

1.

Name: Tárhely.Eu Kft., 1144 Budapest, Ormánság utca 4.

Contact: [info@tarhely.eu](mailto:info@tarhely.eu)

2.

Name: Hostinger International Ltd.

Registered office: 61 Lordou Vironos Street, 6023 Larnaca, Cyprus

Contact: [gdpr@hostinger.com](mailto:gdpr@hostinger.com)

Data processing will continue until the termination of the agreement between the data controller and the data processors or until the data subject requests deletion.

In view of the change in hosting provider, the data controller will carry out the migration of data, during which:

- personal data will be stored on the servers of Tárhely.Eu Kft. (until July 16, 2026 at the latest),
- the data will be transferred to the servers of Hostinger International Ltd. (starting no earlier than June 19, 2026).

During the transition period, personal data **may temporarily be present in both providers' systems** for backup and migration purposes.

Upon completion of the transition, Tárhely.Eu Kft. **will be terminated** as a data processor, and personal data will henceforth be processed exclusively on the infrastructure of Hostinger International Ltd.

Fact of processing, scope of data processed: all personal data provided by the data subject.

Data subjects: all data subjects using the website.

Purpose of data processing: to make the website available and to ensure its proper operation.

Duration of data processing, deadline for deletion of data: until the termination of the agreement between the data controller and the hosting provider or until the data subject's request for deletion to the hosting provider.

The legal basis for the processing of the data is Article 6 (1) (f) of the GDPR and Article 13/A (3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

Rights of the data subject:

- You can find out about the circumstances of data processing,
- You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.

- You have the right to have inaccurate personal data corrected by the controller without undue delay upon your request.
- You may object to the processing of your personal data.

### **Website operation**

Activity performed by the data processor: website maintenance (monitoring, technical updates, security system development, other developments, repair tasks)

Name and contact details of the data processor:

Name: Ferenc Kubicsek sole proprietor

Address: 9400 Sopron, Schönherr-malom utca 27.

E-mail: [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu)

Fact of processing, scope of data processed: all personal data provided by the data subject.

Data subjects: all data subjects who use the services of the website or who have registered/ordered on the website.

Purpose of data processing: website operation (development, monitoring, bug fixes)

Duration of data processing, deadline for deletion of data: until the termination of the agreement between the Service Provider and the website operator or until the data subject's request for deletion to the website operator.

The legal basis for the processing of data is Article 6(1)(f) of the GDPR and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

Rights of the data subject:

- You can find out about the circumstances of data processing,
- You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- You have the right to have inaccurate personal data corrected by the controller without undue delay upon your request.
- You may object to the processing of your personal data.

### **Backup management**

Activity provided by the data processor: backup storage (cloud service)

Name and contact details of data processors:

Name: Flextech Inc (Terabox)

Headquarters: c/o Flextech Inc., Singapore / China (the provider's servers are located in several countries)

Availability: [helpdesk@terabox.com](mailto:helpdesk@terabox.com).

Name: Microsoft Ireland Operations Limited (OneDrive)

Head office: South County Business Park, Leopardstown, Dublin 18, Ireland

Availability: <https://support.microsoft.com/home/contact>.

The fact of processing, the scope of the data processed:

In connection with the operation of the website, backups are made at regular intervals, which may include the website's files, databases and associated email account information. Backups may also contain personal data (e.g. data entered on forms, e-mail messages).

Data subjects: all data subjects who use the website and whose data are included on the website, in the database or in correspondence.

Purpose of data processing: to ensure system security and data protection, data recovery in the event of data loss, system failure or external attack.

Duration of processing, time limit for deletion of data: backups are kept for a maximum of 6 months, after which they are automatically or manually deleted.

Legal basis for processing: legitimate interest of the controller (Article 6(1)(f) GDPR) to maintain the secure operation of the website and the personal data.

Fact, purpose and legal basis of the transfer: the backups are stored in a secure, encrypted form on Terabox and on OneDrive cloud service. The service provider's servers may be located outside the European Union, so data may be transferred to third countries. To ensure data security during transfer, backups are uploaded in password-protected, encrypted form.

Rights of the data subject:

- You can find out about the circumstances of data processing,
- You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.

- You have the right to have inaccurate personal data corrected by the controller without undue delay upon your request.
- You may object to the processing of your personal data.

### **Customer data management for maintenance, development and testing**

The fact of processing, the scope of the data processed:

In the course of providing web development and maintenance services, the client's website, its database and related files may be temporarily copied no earlier than June 19, 2026 to a hosting space rented by the developer (data processor) in Germany and in France (operated by Hostinger International Ltd.) for testing, debugging or development purposes. During the copying of the website, the service provider temporarily manages the package file on the source server on its own systems, solely for the purpose of transferring it to the target server. The file may only be accessed by authorised employees of the service provider, and will be deleted immediately after copying, unless its retention is required for the establishment, exercise or defence of legal claims, in which case retention is carried out under separate data protection rules. In such cases, the data are stored for the period necessary for the establishment, exercise or defence of legal claims, but for no longer than 5 years.

This data may include personal data (e.g. registration, order or form data), which will be stored only for the time necessary to provide the service, or for the period required for the establishment, exercise or defence of legal claims.

Stakeholders:

Users of the client's website, customers, or subjects of personal data processed by the client concerned.

Purpose of the processing:

Fixing, testing and improving the website, as well as monitoring the functioning of the service.

Duration of processing:

Up to the duration of the maintenance or improvement, but not more than 30 days. Test data will be permanently deleted after the work is completed.

Legal basis for processing:

The performance of a contract with a customer (Article 6(1)(b) GDPR) and the legitimate interest of the controller (Article 6(1)(f) GDPR).

Data storage location:

The test data will only be temporarily stored on the processor's own server in Hungary or in the EU.

The customer's website data is not transferred to a third country, so it is not uploaded to Terabox or other cloud services outside the EU.

Security measures:

Only the data processor has access to the test data. The data is stored in an encrypted, password-protected environment. Once the work is completed, the data copies are irretrievably deleted.

**Accounting tasks, invoicing:**

Activity carried out by the data processor: accounting and invoicing

Name and contact details of the data processor:

Name: Ferenc Kubicsek sole proprietor

Address: 9400 Sopron, Schönherr-malom utca 27.

E-mail: [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu)

Fact of processing, scope of data processed: name, billing name, billing address, e-mail address, telephone number.

Data subjects: all data subjects who place an order on the website.

Purpose of processing: to perform accounting tasks.

Duration of data processing, deadline for deletion of data: 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.

The legal basis for the processing of data is Article 6(1)(c) of the GDPR and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

Rights of the data subject:

- You can find out about the circumstances of data processing,
- You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- You have the right to have inaccurate personal data corrected by the controller without undue delay upon your request.

**Electronic mail services:**

Activity carried out by the data processor: processing and servicing orders, customer relations

Name and contact details of the data processor:

Name: Google LLC

Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Availability: [www.google.com/contact](http://www.google.com/contact)

Fact of processing, scope of data processed: name, billing name, billing address, e-mail address, telephone number, message content.

Data subjects: all data subjects who contact the controller by e-mail.

Purpose of processing: to contact customers by e-mail.

Duration of data processing, deadline for deletion of data: data processing lasts until the termination of the legal relationship between the data controller and the data subject or, in the case of claims, for 5 years after the contract.

Legal basis for processing: article 6(1)(c) and (f) of the GDPR.

Rights of the data subject:

- You can find out about the circumstances of data processing,
- You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- You have the right to have inaccurate personal data corrected by the controller without undue delay upon your request.

### **Newsletters, online marketing:**

Activity carried out by the data processor: sending newsletters, online marketing

Name and contact details of the data processor:

1.

Name: Brevo (formerly Sendinblue)

Location: 55 Rue d'Amsterdam, 75008 Paris, France

Web: <https://www.brevo.com>

Customer service: [support@brevo.com](mailto:support@brevo.com)

2.

Name: Facebook Inc.

Location: 1 Hacker Way, Menlo Park California, CA 94025 USA

Web: [facebook.com](https://facebook.com)

Customer service: +1 (650) 543-480

3.

Name: ManyChat Inc. (legkorábban 2026.06.19-étől)

Location: 535 Mission St, 14th Floor, San Francisco, CA 94105, USA

Web: <https://manychat.com>

Customer service: [support@manychat.com](mailto:support@manychat.com)

The fact of data processing, the scope of the data processed: name, e-mail address, visitor data

Data subjects: all data subjects who use the website and subscribe to the newsletter.

Purpose of the data processing: to promote and advertise the products available on the website, to increase the number of visitors to the website.

Duration of data processing, deadline for deletion of data: until the termination of the agreement between the Service Provider and the data processor referred to in this point or until the data subject's request for deletion to this data processor.

The legal basis for data processing: the User's consent, the Infotv. Article 5(1), Article 6(1)(a), and Article 13/A(3) of Act CVIII of 2001 on Certain Aspects of Electronic Commerce Services and Information Society Services.

Rights of the data subject:

- You can find out about the circumstances of data processing,
- You have the right to receive feedback from the controller on whether your personal data are being processed and to have access to all information relating to the processing.
- You have the right to receive your personal data in a structured, commonly used, machine-readable format.
- You have the right to have inaccurate personal data corrected by the controller without undue delay upon your request.

### **Automated Customer Information and Communication (AI Chatbot) (from 19 June, 2026)**

The chatbot available on this website is designed to provide automated responses to user inquiries based on the content of the website.

During the use of the chatbot, messages provided by the user may be processed, including through the use of external artificial intelligence services.

**Data processors:**

- SmartPublish (chatbot service provider)

Operator: Webvezer Media FZE

Registered office: Sharjah, University City, Block B – B47-032, United Arab Emirates

Business license number: 9337

Representative: Zsolt Gyura

E-mail: [info@smartpublish.ai](mailto:info@smartpublish.ai)

- OpenAI (artificial intelligence processing)

Operator: OpenAI OpCo, LLC

Registered office: 1455 3rd Street, San Francisco, California 94158, United States

E-mail: [ar@openai.com](mailto:ar@openai.com)

**Scope of processed data:**

- messages entered by the user,
- optionally provided personal data,
- technical and interaction-related data.

**Purpose of data processing:**

- providing information related to the website content,
- answering user inquiries,
- improving user experience.

**Legal basis:**

- consent of the data subject (Article 6(1)(a) GDPR),
- legitimate interest (Article 6(1)(f) GDPR) in operating and improving the service.

**Data retention period:**

Conversations conducted via the chatbot are stored for a maximum of 90 days and are then deleted, unless further retention is required for customer relationship purposes.

**Cookie management (cookies)**

Cookies specific to webshops are the so-called "password-protected session cookies", "security cookies", "essential cookies", "functional cookies" and "cookies responsible for

the management of website statistics", which do not require the prior consent of the data subject.

Fact of processing, scope of data processed: unique identifier, dates, times

Data subjects: all data subjects visiting the website.

Purpose of data processing: to identify users, to register the "shopping cart" and to track visitors.

Duration of processing, deadline for deletion of data:

Session cookies (session)

- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.)

- Period until the end of the relevant visitor session

Permanent or saved cookies

- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.)

- until the deletion of the data subject

Cookies needed for the site to work (instruShowed, frontend, frontend\_cid)

- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.)

- until the deletion of the data subject

Marketing cookies (popupData, om, om-success-cookie, om-success)

- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.)

- until the deletion of the data subject

Cross marketing cookies (PAP..)

- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.)

- Period until the end of the relevant visitor session

Customer service cookies

- Paragraph (3) of Article 13/A of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elkertv.)

- Period until the end of the relevant visitor session

(Start of visit, end of visit, anonymised user id, ID of chat conversation started)

Identity of the potential data controllers who may access the data: no personal data is processed by the data controller through the use of cookies.

Description of data subjects' rights in relation to data processing: data subjects have the possibility to delete cookies in the Tools/Preferences menu of their browsers, usually under the Privacy settings.

Legal basis for processing: no consent is required from the data subject where the sole purpose of the use of cookies is to provide a communication over an electronic communications network or where the service provider strictly needs the cookies to provide an information society service explicitly requested by the subscriber or user.

### **Use Google Adwords conversion tracking**

The data controller uses the online advertising program "Google AdWords" and makes use of Google's conversion tracking service within its framework. Google Conversion Tracking is an analytics service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When you visit a website through a Google ad, a cookie is placed on your computer for conversion tracking. These cookies have a limited validity and do not contain any personal data, so the User cannot be identified by them.

When the User browses certain pages of the website and the cookie has not expired, Google and the data controller may see that the User has clicked on the advertisement.

Each Google AdWords client receives a different cookie, so they cannot be tracked through AdWords clients' websites.

The information, which is obtained through the use of conversion tracking cookies, is used to provide conversion statistics to AdWords customers who choose to track conversions. Clients are then informed about the number of users who click on their ad and are referred to a page with a conversion tracking tag. However, they do not have access to information that would allow them to identify any user.

If you do not wish to participate in conversion tracking, you can opt-out by disabling the option to set cookies in your browser. You will then not be included in the conversion tracking statistics.

Further information and Google's privacy statement can be found on the following page: [www.google.de/policies/privacy](http://www.google.de/policies/privacy)

### **Using Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site you have visited.

The information generated by the cookies on the website used by the User is usually transferred to a Google server in the USA and stored there. By activating the IP anonymisation on the website, Google will previously shorten the IP address of the User within the Member States of the European Union or in other states party to the Agreement on the European Economic Area.

The full IP address will be transmitted to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity for the website operator and to provide other services relating to website activity and internet usage.

The IP address transmitted by the User's browser within the framework of Google Analytics will not be merged with other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may also prevent Google from collecting and processing information about your use of this website (including your IP address) by means of cookies by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=hu>

### **Facebook Pixel**

A Facebook account is code that allows the website to report conversions, create audiences and provide the site owner with detailed analytics on how visitors use the site. The Facebook remarketing pixel tracking code can be used to display personalised offers and ads to website visitors on Facebook. The Facebook remarketing list is not personally identifiable. For more information about Facebook Pixel / Facebook Account, click here: <https://www.facebook.com/business/help/651294705016616>

### **Using Hotjar**

In order to improve the user experience, the website **Hotjar** also use the service. Hotjar Ltd (address: Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta) uses technologies (e.g. cookies, local storage, tracking code) to analyse how visitors use the website (e.g. mouse movements, scrolling, clicks, statistics on completed forms).

The data collected will only be used **anonymous, statistical** are used for analysis. Hotjar does not record any personal data (e.g. name, e-mail address, IP address in an identifiable form).

The information collected by Hotjar is stored on Hotjar servers in the European Union.

The legal basis for the use of Hotjar cookies and trackers is the user's **consent** [Article 6(1)(a) GDPR].

The user can withdraw his consent at any time by refusing to accept functional cookies

or by using the opt-out function provided by  
Hotjar: <https://www.hotjar.com/legal/compliance/opt-out>

### **Newsletter and push messaging system**

Pursuant to Article 6 of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activity, the User may expressly consent in advance to the Service Provider contacting him/her with advertising offers and other mailings at the contact details provided at the time of registration.

In addition, the Customer may, subject to the provisions of this notice, consent to the processing of personal data by the Service Provider necessary for the sending of advertising offers.

The Service Provider will not send unsolicited commercial messages and the User may unsubscribe from receiving offers without any restriction and without giving any reason, free of charge. In this case, the Service Provider will delete all personal data necessary for sending advertising messages from its records and will not contact the User with further advertising offers. The User may unsubscribe from advertising by clicking on the link in the message.

The fact of collection, the scope of the data processed and the purpose of the processing:

Purpose of the processing:

- Identification, to enable subscription to the newsletter.
- Perform a technical operation.

Personal data:

- Name
- E-mail address
- Telephone number
- Date of subscription
- Your IP address at the time of subscription

Data subjects: all data subjects who subscribe to the newsletter.

Purpose of data processing: sending electronic messages (e-mail, SMS, push messages) containing advertising to the data subject, providing information about current information, products, promotions, new features, etc.

Duration of data processing, deadline for deletion of data: until the withdrawal of the consent, i.e. until unsubscription.

Identity of the potential controllers of the data, recipients of the personal data: personal data may be processed by the customer service and marketing staff of the controller, in compliance with the above principles.

Description of data subjects' rights in relation to data processing:

The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her, and

may object to the processing of their personal data and the data subject has the right to data portability and to withdraw consent at any time.

The data subject may request access to, erasure, modification or restriction of processing of personal data, data portability or objection to the processing of personal data in the following ways:

9400 Sopron, Schönherr-malom utca 27,

by e-mail to [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu) by e-mail,

by phone on +36 31 788-9580.

The person concerned may unsubscribe from the newsletter at any time, free of charge.

Legal basis for data processing: the data subject's consent, Article 6 (1) (a) and (f) and Article 6 (5) of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities: the advertiser, the advertising service provider or the publisher of the advertisement shall keep a record of the personal data of the persons who have given their consent within the scope specified in the consent. The data recorded in this register concerning the addressee of the advertisement may only be processed in accordance with the consent given in the consent form, until it is withdrawn, and may only be disclosed to third parties with the prior consent of the person concerned.

Please note that

- processing is based on your consent and the legitimate interest of the service provider.
- you are required to provide personal data if you wish to receive newsletters from us.
- Failure to provide this information will result in us not being able to send you a newsletter.

### **Complaints handling:**

The fact of collection, the scope of the data processed and the purpose of the processing:

Personal data - Surname and first name

Purpose of processing - Identification, contact.

E-mail address - Contact.

Phone number - Contact.

Invoice name and address - Identification, handling quality complaints, questions and problems with the products ordered.

Data subjects: all data subjects who shop on the website and complain about quality.

Duration of data processing, deadline for deletion of data: copies of the record, transcript and reply to the recorded objection shall be kept for 5 years pursuant to Article 17/A (7) of Act CLV of 1997 on Consumer Protection.

Potential controllers of the data, recipients of the personal data: personal data may be processed by the customer service staff of the controller, in compliance with the above principles.

Description of data subjects' rights in relation to data processing:

- The data subject may request the controller to access, rectify, erase or restrict the processing of personal data relating to him or her; and
- the data subject has the right to data portability and the right to withdraw consent at any time.

The data subject may request access to, deletion, modification or restriction of processing of personal data, or the portability of data in the following ways:

9400 Sopron, Schönherr-malom utca 27,

by e-mail to [info@kubicsekweblapok.hu](mailto:info@kubicsekweblapok.hu) by e-mail,

by phone on +36 31 788-9580.

Legal basis for processing: the data subject's consent, Article 6 (1) (c) and Article 17/A (7) of Act CLV of 1997 on Consumer Protection.

Please note that

- the provision of personal data is based on a legal obligation.
- the processing of personal data is a precondition for the conclusion of the contract.
- must provide personal data in order for us to handle your complaint.
- Failure to provide the data will result in us not being able to deal with your complaint.

**Social networking sites:**

The fact of data collection, the scope of data processed: the name registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram, etc. social networking sites, and the user's public profile picture.

Data subjects: all data subjects who are registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. and have "liked" the website.

Purpose of the data collection: to share or "like" certain content, products, promotions or the website itself on social networking sites.

Duration of data processing, time limit for deletion of data, the identity of the possible controllers entitled to access the data and the rights of the data subjects in relation to data processing: the data subject can find out about the source of the data, the processing of the data and the method and legal basis of the transfer on the relevant Community site. The data are processed on the social networking sites, so the duration of the processing, the way in which the data are processed and the possibilities for deleting and modifying the data are governed by the rules of the social networking site concerned.

Legal basis for processing: the data subject's voluntary consent to the processing of his or her personal data on social networking sites.

**Customer relations and other data management:**

If the data subject has any questions or problems when using our services, he or she can contact the data controller by the means indicated on the website (telephone, e-mail, social networking sites, etc.).

The Data Controller will delete the data provided in e-mails, messages, telephone, Facebook, etc., together with the name and e-mail address of the interested party and other personal data voluntarily provided by the interested party, after a maximum of 5 years from the date of the communication.

We will provide information on data processing not listed in this notice at the time of collection.

In exceptional cases, the Service Provider shall be obliged to provide information, disclose data, hand over data or make documents available upon request of a public authority or other bodies authorised by law.

In such cases, the Service Provider will disclose personal data to the requesting party only to the extent and to the extent strictly necessary for the purpose of the request, provided that the requesting party has indicated the exact purpose and scope of the data.

Rights of data subjects:

## Right of access

● You have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is taking place, the right to access your personal data and the information listed in the Regulation.

## The right to rectification

● You have the right to have inaccurate personal data relating to you corrected by the controller without undue delay at your request. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

## The right to erasure

● You have the right to obtain from the controller the erasure of personal data relating to you without undue delay upon your request, and the controller is obliged to erase personal data relating to you without undue delay under certain conditions.

## The right to be forgotten

● If the controller has disclosed the personal data and is required to delete it, it will take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that you have requested the deletion of the links to or copies of the personal data in question.

## Right to restriction of processing

● You have the right to have the controller restrict processing at your request if one of the following conditions is met:

● You contest the accuracy of the personal data, in which case the restriction applies for the period of time that allows the controller to verify the accuracy of the personal data;

● the processing is unlawful and you object to the deletion of the data and instead request the restriction of their use;

● the controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;

● you have objected to the processing; in this case, the restriction applies for the period until it is established whether the controller's legitimate grounds prevail over your legitimate grounds.

## The right to data portability

● You have the right to receive the personal data concerning you that you have provided to a controller in a structured, commonly used, machine-readable format and the right

to transmit these data to another controller without hindrance from the controller to whom you have provided the personal data.

The right to protest

- For processing based on legitimate interest or public authority as legal grounds, you have the right to object to the processing of your personal data, including profiling based on these provisions, at any time on grounds relating to your particular situation.

Objection in the case of direct acquisition

- Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data may no longer be processed for those purposes.

Automated decision-making on individual cases, including profiling

- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. The previous paragraph shall not apply where the decision:
  - necessary for the conclusion or performance of a contract between you and the controller;
  - is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect your rights and freedoms and legitimate interests; or
  - Based on your explicit consent.

## **DEADLINE FOR ACTION**

The controller shall inform you of the action taken on such requests without undue delay and in any event within 1 month of receipt of the request. If necessary, this may be extended by 2 months. The controller shall inform you of the extension, stating the reasons for the delay, within 1 month of receipt of the request. If the controller does not take action on your request, it shall inform you without delay and at the latest within one month of receipt of the request of the reasons for non-action and of your right to lodge a complaint with a supervisory authority and to seek judicial remedy.

## **THE SECURITY OF DATA PROCESSING**

The controller and the processor shall implement appropriate technical and organisational measures, taking into account the state of the art and the cost of

implementation, the nature, scope, context and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons, in order to ensure a level of data security appropriate to the level of risk, including, where appropriate:

- the pseudonymisation and encryption of personal data;
- the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
- the ability to restore access to and availability of personal data in the event of a physical or technical incident in a timely manner;
- a procedure for regularly testing, assessing and evaluating the effectiveness of the technical and organisational measures taken to ensure the security of data processing.

### **Informing the data subject about the personal data breach**

Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject of the personal data breach without undue delay. The information given to the data subject shall clearly and prominently describe the nature of the personal data breach and provide the name and contact details of the data protection officer or other contact person who can provide further information; describe the likely consequences of the personal data breach; describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach. The data subject need not be informed if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational protection measures and those measures have been applied to the data affected by the personal data breach, in particular measures such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;
- the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise;
- information would require a disproportionate effort.

In such cases, the data subjects should be informed by means of publicly disclosed information or by a similar measure which ensures that the data subjects are informed in an equally effective manner. Where the controller has not yet notified the data subject of the personal data breach, the supervisory authority may, after having considered whether the personal data breach is likely to present a high risk, order the data subject to be informed.

### **REPORTING A PERSONAL DATA BREACH TO THE AUTHORITY**

The data protection incident shall be notified by the controller to the supervisory authority competent under Article 55 without undue delay and, where possible, no later than 72 hours after the data protection incident has come to its attention, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by the reasons justifying the delay.

## **POSSIBILITY TO COMPLAIN**

Complaints against possible infringements by the data controller can be lodged with the National Authority for Data Protection and Freedom of Information: National Authority for Data Protection and Freedom of Information 1125 Budapest, Szilágyi Erzsébet fasor 22/C. Postal address: 1530 Budapest, P.O. Box 5 Phone: +36 -1-391-1400 Fax: +36-1-391-1410 E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## **CLOSE**

The following legislation has been taken into account in the preparation of this information:

- REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation)
- Act CXII of 2011 - on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Infotv.)
- Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services (in particular § 13/A)
- Act XLVII of 2008 - on the prohibition of unfair commercial practices against consumers;
- Act XLVIII of 2008 - on the basic conditions and certain restrictions of economic advertising (in particular § 6)
- Act XC of 2005 on Electronic Freedom of Information
- Act C of 2003 on Electronic Communications (specifically § 155)
- Opinion No 16/2011 on the EASA/IAB Recommendation on best practice on behavioural online advertising
- Recommendation of the National Authority for Data Protection and Freedom of Information on the data protection requirements for prior information

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC.

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