

Privacy Policy

Data Management

DATA MANAGEMENT INFORMATION

NASPOLYAFA KFT.

VALID

FROM 14 DECEMBER 2020

- **Data controller's data:**

Company name: Naspolyafa Kft.

Seat: 2116 Zsámbok, Szent László utca 56.

Company registration number: 13-09-153914

Tax number: 23810350-2-13

Representative: Matthew Hayes Managing Director

Phone number: 0630/0723303

E-mail address: info@zsambokibiokert.hu

- **The purpose of this Privacy Notice is to:**

The controller acknowledges that it is bound by the contents of this legal notice. This Privacy Notice is intended to inform your customers, partners and clients about the processing of their personal data.

The data controller shall process personal data only in accordance with the provisions of applicable law and in strict compliance with the provisions on data management and data protection, taking into account the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy and limited storage.

The data controller shall take all technical and organisational measures to ensure that the personal data of its partners are processed in a secure manner as required by Regulation (EU) 2016/679 of the European Parliament and of the Council.

The data controller has adapted its day-to-day activities, developed its rules, records and standard documents in line with the above.

The privacy policy relating to the data processing of the controller is permanently available at the controller's headquarters and on its website. The controller reserves the right to change this policy at any time. It will of course inform its audience of any changes in due time.

The data controller is committed to protecting the personal data of its customers and partners, and attaches great importance to respecting the right of customers to information self-determination. The data controller treats personal data confidentially and takes all security, technical and organisational measures to guarantee the security of the data. The Data Controller describes its data management practices below.

- **The personal, material and temporal scope of the Privacy Notice:**

The personal scope of this Privacy Notice extends to the controller and to the natural persons whose data are included in the processing covered by this Notice, as well as to persons whose rights or legitimate interests are affected by the processing.

The scope of this Notice covers all processing in the course of the controller's activities, except for so-called internal processing (e.g. in relation to employees), which is regulated in the controller's Privacy Policy.

This Policy shall enter into force on the date of approval and shall remain in force indefinitely until further notice.

- **Important definitions:**

Personal data: any information relating to an identified or identifiable natural person. 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.

Special categories of personal data: any data that fall within special categories of personal data, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data revealing the identity of natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons.

Data processing: 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, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction or destruction.

Controller: 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.

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

Joint controllers: where the purposes and means of processing are jointly determined by two or more controllers, they are considered to be joint controllers.

Third party: a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Consent of the data subject: a voluntary, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or an unambiguous act of affirmation.

Data breach: 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.

- **Lawful processing by the controller:**

Personal data are processed by the controller only in the following cases:

- where the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes,
- processing is necessary for the performance of a contract to which the data subject is a party,
- processing is necessary for compliance with a legal obligation to which the controller is subject,
- processing is necessary for the protection of the vital interests of the data subject or of another natural person,
- processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.

The controller examines the lawfulness of data processing at all stages of its activities, and only processes data for which it can justify the purpose and legal basis. In the event that the conditions of a legal basis cease to apply, the processing may only be resumed if the controller can demonstrate an adequate alternative legal basis.

As a general rule, the way of proving the legal basis is in writing, but even in the case of a legal basis created by implied conduct, it must be examined whether it can be clearly proved ex post. In case of doubt, for reasons of reasonableness and economy, written confirmation of the imputability should be sought.

In the case of consent-based processing, the data subject gives his or her written consent to the processing of his or her personal data. Consent is not formally required, but subsequent evidence requires written consent on paper or in electronic form.

Processing based on a legal basis to fulfil a legal obligation is independent of the data subject's consent, as the processing is defined by law.

Irrespective of the mandatory nature of the processing, the private individual concerned must be informed before the processing starts that the processing is mandatory and cannot be avoided, and must be provided with clear and detailed information on all relevant facts concerning the processing of his or her data before the processing starts.

According to the GDPR (General Data Protection Regulation), personal data may also be processed if the processing is necessary for the performance of a contract to which the individual concerned is a party or if the processing is necessary for the purposes of taking steps at the request of the data subject prior to entering into a contract. The controller may process personal data for the purposes of the conclusion, performance or termination of the contract on the basis of the legal basis for performance of the contract.

- **Processing of personal data by the controller:**

The data controller is engaged in the retail sale of fruit and vegetables. It sells its products through its webshop, fairs, markets and shopping communities, and also delivers them to and from its premises. In the course of these activities, personal data of natural persons are processed. It carries out the following data processing activities:

- The data controller receives orders for the sale of the products it markets primarily through its website (zsambokibokert.unas.hu). Customers may be both individuals and legal entities. The customer may choose to purchase from the online store after registration or without registration. Once registered, customers can view their previous orders (by entering their e-mail address and password), the status of their current orders, their current orders and it is easier for them to place a new order without having to re-enter their details. Both during registration and in the case of orders without registration, the name of the customer (including the name of the contact person in the case of legal entities), address, e-mail address, telephone number, tax number are requested by the data controller. The legal basis for the processing of personal data is the performance of contractual obligations (Article 6(1)(b) of the General Data Protection Regulation). In the case of a legal person, the personal data of the contact person are processed on the basis of the consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation). The controller issues a receipt or invoice for the value of the products it has distributed. The receipt does not contain personal data. The invoice will contain the name, address and possibly the tax number of the data subject. The issuing of the invoice is a statutory obligation of the controller. The legal basis for the processing of personal data on the invoice is therefore the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The personal data on the invoice are stored by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.
- The data controller also sells its products at fairs and markets. In such cases, the customer indicates his/her intention to purchase and selects the product he/she wishes to buy. The data controller issues a receipt or invoice for the value of the product. The receipt does not contain any personal data. The invoice contains the name, address and possibly the tax number of

the buyer. The issuing of the invoice is a legal obligation of the controller. The legal basis for the processing of personal data is the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The personal data on the invoice are stored by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.

- In the performance of its tasks, the data controller may process the e-mail addresses and telephone numbers of its partners and customers, in order to fulfil its contractual obligations (Article 6(1)(b) of the General Data Protection Regulation) or on the basis of their individual consent (Article 6(1)(a) of the General Data Protection Regulation).
- The controller may also have contractual relationships with subcontractors, suppliers and service providers in the course of its work, which also provide a basis for the processing of personal data. In this case, the legal basis for the processing of personal data is (in the case of an individual or sole trader) the performance of a contractual obligation (Article 6(1)(b) GDPR), and in the case of personal data of a contact of a legal person, the explicit, prior informed consent of the data subject (Article 6(1)(a) GDPR).
- The data controller operates the websites zsambokibiokert.hu, www.zsambokibiokert.unas.hu. The legal basis for the processing is the consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation).
- On the website zsambokibiokert.unas.hu, the visitor of the site has the possibility to contact the data controller by means of a contact form. In the form, the name, e-mail address and telephone number of the interested party must be provided. The purpose of the processing of personal data is to contact the visitor of the site and the person interested in the products of the controller. If no order is placed after contacting the data controller, the personal data of the interested party will be deleted immediately, but within 3 working days at the latest. The controller processes the personal data for the purpose of concluding a contract on this legal basis (Article 6(1)(b) of the General Data Protection Regulation). By filling in the form, the data subject declares that he or she has read the controller's Privacy Policy and acknowledges the contents thereof.
- The data controller publishes its blog posts on the website zsambokibiokert.hu. After logging in, you can add comments to the entries by entering your name and e-mail address. By posting a comment and entering personal data, the data subject gives his/her consent to the processing of his/her personal data and to its publication on the website by ticking the box provided. The legal basis for the processing of personal data is the data subject's informed consent (Article 6(1)(a) of the General Data Protection Regulation). The data subject declares that he or she has read and understood the Controller's Privacy Notice and has taken note of the information contained therein. The controller shall not use the personal data for any other purpose and shall not make them available to third parties. The controller shall process the personal data thus recorded until the data subject's consent is withdrawn. If the data subject withdraws his or her consent, the controller shall delete the recorded personal data from its system without undue delay and at the latest within 3 working days.
- The data controller also offers the possibility to subscribe to a newsletter by providing your name and e-mail address. By subscribing to the newsletter, the data subject declares that he/she has read the Data Controller's Privacy Policy and gives his/her consent to the processing of his/her personal data for marketing purposes. The data subject shall have the rights set out in the Data Protection Notice and shall be able to exercise those rights in the manner and at the places indicated therein. Accordingly, the legal basis for the processing of personal data in the course of sending the newsletter is the explicit and written informed consent of the subscriber (Article 6(1)(a) of the General Data Protection Regulation).
- The data controller also operates social networking sites, where personal data is also processed. The controller also promotes its activities and the products it sells on social networking sites. The legal basis for the processing is the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation).
- The data controller occasionally takes photographs or videos of its customers, partners and clients. If the recording shows a recognizable individual, the recording is made and used - in connection with the controller's websites, social networking sites or other appearances - only with the prior, informed, written and voluntary consent of the data subject (or, in the case of a person under 18 years of age, the legal representative). The legal basis for processing is the consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation).
- The purpose of data processing in the course of complaint handling in relation to the activities of the data controller is to enable the communication of the complaint, to identify the data subject and his/her complaint, to record the data required by law to be recorded, to investigate the complaint and to maintain contact in connection with its resolution.

In case of a complaint, the processing of the complaint and thus of personal data is mandatory under Act CLV of 1997 on Consumer Protection. The legal basis for the processing of personal data is therefore the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

The data controller shall keep records of the processing described above. The register shall also include the time limits for the erasure of personal data. The register is annexed to this Privacy Notice.

• **Processors connected to the controller:**

Where the processing is carried out on behalf of the controller, the controller may only use processors that offer adequate guarantees of compliance with the requirements of the General Data Protection Regulation or implement appropriate technical and organisational measures to ensure the protection of the rights of data subjects.

The Data Controller hereby declares that in the course of its work, it will only deal with data processors that have adequate guarantees of compliance with the GDPR Regulation and that they implement appropriate technical and organisational measures to ensure the protection of the rights of data subjects. The relevant declarations of the data processors are available to you.

By reading and acknowledging this Privacy Notice, data subjects accept that the controller transfers their personal data to the processors and joint controllers listed below.

- The data processor is the accounting firm employed by the data controller:

- Kontratax Ltd.
- 2116 Zsámbok, Szent Imre utca 4.
- iroda@kontratax.hu; konyveles@kontratax.hu

- The data controller's partner for issuing invoices:
- hu Ltd.
- 1031 Budapest, Záhony u. 7.
- info@szamlazz.hu

- For payment by credit card, the data controller is the data processor, who is also the independent data controller:
- B-Payment Zrt.
- 1132 Budapest, Váci út 4.
- Telephone: 061/79 36 776
- info@b-payment.hu

The legal basis for the processing of personal data is the performance of the contract and, thereafter, the legal obligation to retain the data.

- For payment by credit card, the data controller is the data processor, who is also the independent data controller:
- Paylike .
- O. Pedersensvej 14. Aarhus, Denmark
- Phone: 061/5009480
- hello@paylike.hu

The legal basis for the processing of personal data is the performance of the contract and, thereafter, the legal obligation to retain the data.

- The courier company employed by the controller is the data processor (and also the independent data controller in the performance of its tasks):
- Aranykerék Courier Service Ltd.
- 1071 Budapest Dembinszky utca 32.
- iroda@aranykerek.hu

- The courier company employed by the controller is the data processor (and also the independent data controller in the performance of its tasks):
- Gólya Courier Service Ltd.
- 1089 Budapest Orczy út 46.-48.
- golyafutarbp@gmail.com
-

- The company that hosts the websites of the data controller is also a data processor:
- Tárhelypark Kft.
- 1126 Budapest, Tartsay Vilmos utca 14.
- info@tarhelypark.hu
- +3617004140

- The server of the controller's mail system is also a data processor:
- cPanel L.L.C.
- 2550 North Loop W. Suite 4006 Houston TX 77092 USA
- +1 713 529 0800

- Additional data processor in connection with the sending of the newsletter:
- The Rocket Science Group, LLC
- 675 Ponce de Leon Ave NE
Suite 5000
Atlanta, GA 30308 USA

- The operator of the website szatyorbolt.hu is considered a joint controller:
- Szatyorbolt Zrt.
- 1085 Budapest, Gyulai Pál utca 12.
- zoldszatyor@gmail.com

- Contractors operating collection points for the collection of products ordered from the controller are also considered as data processors:
- Ligeti Shop Ltd.
- 2081 Piliscsaba József Liget u. 36.
- bolt@csomagolasmentes.hu.

- Ernita Ltd.
- 1182 Budapest Üllői út 743.
- Okokamra18@gmail.com.

- Well House Manufac tour
- 2100 Gödöllő Premontrei utca 20.
- 06308133571

- Cyclonomia Social Cooperative
- 1071 Dembinszky u. 32.
- info@cargonomia.hu

- Common Place
- 1192 Budapest Nádasdy u. 1.
- awkszoetkezet@atalakulo.hu
-
- Espresso Embassy
- 1051 Budapest, Arany János utca 15.
- info@espressoembassy.hu
- KASKA Packaging-free Shop
- 2051 Biatorbágy, Szabadság utca 12.
- info@espressoembassy.hu
- Little Nice Shop
- 2100 Gödöllő, Szabadság út 5..
- godolloiszatyor@gmail.com
- Rákoscscaba Shopping Cooperative
- 1171 Budapest, Nagyszénás utca 46.
- szoni@gmail.com
-

When storing data in an online cloud database, the service provider is considered a data processor:

- Dropbox
- privacy@dropbox.com
- 5 Hatch Street Upper, Saint Peter's, Dublin, Ireland
- The use of social networking sites makes us a data processing and joint data controller partner:
- Facebook Ireland Ltd.
- 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland

Owner of the social video sharing site YouTube:

- Google Ireland Limited
- Gordon House, Barrow Street, Dublin 4, Ireland
- The controller also transfers personal data of its customers to the National Tax and Customs Administration.

The contracted data processing and data management partners will process the personal data of partners only on the basis of instructions given by the data controller (except where required by law) and under an obligation of confidentiality.

- **Processing of data relating to contracts concluded by the controller:**

Customer contracts:

The data controller receives orders for the sale of the products it markets primarily through its website (www.zsambokibokert.unas.hu). Customers may be both individuals and legal entities. The customer may choose to purchase from the online store after registration or without registration. Once registered, customers can view their previous orders (by entering their e-mail address and password), the status of their current orders, their current orders and it is easier for them to place a new order without having to re-enter their details. Both during registration and in the case of orders without registration, the name of the customer (including the name of the contact person in the case of a legal person), address, e-mail address, telephone number, tax number are requested by the data controller. The legal basis for the processing of personal data is the performance of contractual obligations (Article 6(1)(b) of the General Data Protection Regulation). In the case of a legal person, the personal data of the contact person are processed on the basis of the consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation). The controller issues a receipt or invoice for the value of the products it has distributed. The receipt does not contain personal data. The invoice will contain the name, address and possibly the tax number of the data subject. The issuing of the invoice is a statutory obligation of the controller. The legal basis for the processing of personal data on the invoice is therefore the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The personal data on the invoice are stored by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.

The data controller also sells its products at fairs and markets. In such cases, the customer indicates his/her intention to purchase and selects the product he/she wishes to buy. The data controller issues a receipt or invoice for the value of the product. The receipt does not contain any personal data. The invoice contains the name, address and possibly the tax number of the buyer. The issuing of the invoice is a legal obligation of the controller. The legal basis for the processing of personal data is the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The personal data on the invoice are stored by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.

The data controller is a member of the Satchel Shopping Community. The producers offer their products through the website www.szatyorbolt.hu and the customers buy them. The data controller receives orders for the sale of its products on the website. Customers can be both individuals and legal entities. Once registered, customers can view their previous orders, the status of their current orders, their current orders and it is easier for them to place a new order without having to re-enter their data. During the purchase process, the name (including the name of the contact person in case of a legal entity), address, e-mail address and telephone number of the customer will be requested by the data controller. The legal basis for the processing of personal data is the performance of contractual obligations (Article 6(1)(b) of the General Data Protection Regulation). In the case of a legal person, the personal data of the contact person are processed on the basis of the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation). The controller issues a receipt or invoice for the purchase price of the products. The receipt will not contain personal data. The invoice will contain the name, address and possibly the tax number of the data subject. The issuing of the invoice

is a statutory obligation of the controller. The legal basis for the processing of personal data on the invoice is therefore the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The controller shall act in accordance with the provisions of the law with regard to the storage of personal data on the invoice and shall keep them for 8 years.

Supplier contracts:

The data controller may also process the contact details of suppliers (name, e-mail address, telephone number) and may also contact service providers and subcontractors. In these cases, personal data (personal data of the contact person or of the individual or sole trader) may also be processed in order to contact partners. The legal basis for the processing of personal data is the performance of a contractual obligation (Article 6(1)(b) GDPR) or the consent of the contact person (Article 6(1)(a) GDPR).

The data controller will fill in a consent form with the contact persons of the companies, informing them of their rights in relation to personal data and asking for their consent to process their data. In such cases, the legal basis for the processing of personal data is the explicit, written and duly informed consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation). If the contract with the partner has been terminated and there is no legal obligation to keep the data and documents, the telephone numbers and e-mail addresses will be deleted. The personal data contained in the contract and the invoice will be kept by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.

- **Processing invoices issued to customers and the personal data contained therein:**

The data controller issues a receipt or invoice to the customer for the value of the products it has sold. The receipt does not contain personal data. The invoice will contain the name, address and possibly the tax number of the customer. The invoice is issued by the controller to fulfil a legal obligation. The legal basis for the processing of personal data on the invoice is the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The personal data on the invoice are stored by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.

- **Children's data, processing of special categories of personal data:**

The data subject declares that he or she is at least 16 years of age in relation to the commenting of blog posts on the websites of the controller, the subscription to the newsletter and the consent to the functioning of cookies used by the websites. A person under the age of 16 may not comment on blog posts, subscribe to newsletters or consent to the collection of data by the cookies used by the websites, given that, pursuant to Article 8(1) of the General Data Protection Regulation (GDPR), the validity of his/her consent to the processing of personal data requires the consent of his/her legal representative. The controller is not in a position to verify the age and entitlement of the person giving consent, so the data subject warrants that the data he or she has provided is accurate.

Special data brought to the attention of the controller or which have come to the attention of the controller shall not be recorded by the controller. If such data have been entered into any system without the controller's knowledge, the controller shall delete them from the system immediately after their detection.

- **Retention of e-mail addresses and telephone numbers by the data controller:**

In the course of its activities, the data controller may also obtain the e-mail addresses and telephone numbers of its partners, customers and clients. The personal data thus entered into its system is processed primarily for the purpose of fulfilling its contractual obligations (Article 6(1)(b) of the General Data Protection Regulation). If the contract with the partner has been terminated and the legal obligation to keep the data and documents no longer applies, the telephone numbers and e-mail addresses will be deleted. In some cases, the data controller will still have a legitimate interest in retaining the data and will request the explicit and written consent of the data subject to the retention of his or her personal data (Article 6(1)(a) of the General Data Protection Regulation).

- **Taking photos, video recordings at the data controller:**

The data controller occasionally takes photographs or videos of its customers, partners and clients. If the recording shows a recognizable individual, the recording is made and used - in connection with the controller's websites, social networking sites or other appearances - only with the prior, informed, written and voluntary consent of the data subject (or, in the case of a person under 18 years of age, the legal representative). The legal basis for processing is the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation).

If the data subject withdraws consent and requests the cessation of the use of the recording, or the deletion of the recording, the controller shall comply with that request without delay.

- **The websites of the controller:**

The data controller presents its activities and the products it sells to interested parties on its websites. The websites provide visitors with information about the services of the controller and the possibility to order products.

The websites of the controller:

www.zsambokibiokert.hu

www.zsambokibiokert.unas.hu

The websites of the data controller use cookies in their operation. The legal basis for the processing of personal data obtained from them is the consent of the visitor (Article 6(1)(a) of the General Data Protection Regulation).

The www.zsambokibiokert.hu website uses the following cookies:

- TS018652bb

- duration: until the end of the browsing session
- type: other
- TS01e85bed
- duration: until the end of the browsing session
- type: other
- XSRF-TOKEN
- duration: until the end of the browsing session
- type: other
- bSession
- Duration: 30 minutes
- type: absolutely necessary
- hs
- duration: until the end of the browsing session
- type: other
- svSession
- duration: 2 years
- type: absolutely necessary

The www.zsambokibiokert.unas.hu website uses the following cookies:

- UN_last_prod
- duration: 2 months
- type: other
- UnasID
- duration: until the end of the browsing session
- type: other
- UnasServiceProxyID
- duration: until the end of the browsing session
- type: other

Cookies (Cookies):

What cookies do:

- collect information about visitors and their devices;
- remember visitors' individual preferences, which are (are) used;
- make it easier to use websites;
- provide a quality user experience.

In order to provide a personalised service, a small piece of data called a cookie is placed on the user's computer and read back during a subsequent visit. When the browser returns a previously saved cookie, the cookie provider has the possibility to link the user's current visit to previous visits, but only in relation to its own content.

Session cookies are strictly necessary:

The purpose of these cookies is to allow visitors to browse the websites, use their features and services fully and smoothly. This type of cookie is valid until the end of the session (browsing) and is automatically deleted from the computer or other browsing device when the browser is closed.

The data subject's choice in relation to the Cookie:

Web Browser Cookies:

In the browser settings, the data subject can accept or reject new cookies and delete existing cookies. You can also set your browser to notify you each time a new cookie is placed on your computer or other device. You can find more information about how to manage cookies in the "help" function of your browser.

If the visitor chooses to disable some or all of the cookies, he or she will not be able to use all the features of the websites.

The data subject declares on the websites of the data controller that he or she has reached the age of 16 years in relation to the acceptance of the use of cookies. A person under the age of 16 may not make a declaration of acceptance or refusal of cookies used by the websites, given that, pursuant to Article 8(1) of the General Data Protection Regulation (GDPR), the validity of his/her declaration of consent to processing requires the consent of his/her legal representative. The controller is not in a position to verify the age and entitlement of the person giving consent, so the data subject warrants that the data he or she has provided are accurate.

Personal data processing related to purchases and registration:

The data controller receives orders for the sale of the products it markets primarily through its website (www.zsambokibiokert.unas.hu). Customers may be both individuals and legal entities. The customer may choose to purchase from the online store after registration or without registration. Once registered, customers can view their previous orders (by entering their e-mail address and password), the status of their current orders, their current orders and it is easier for them to place a new order without having to re-enter their details. Both during registration and in the case of orders without registration, the name of the customer (including the name of the contact person in the case of a legal entity), address, e-mail address, telephone number, tax number are requested by the data controller. The legal basis for the processing of personal data is the performance of contractual obligations (Article 6(1)(b) of the General Data Protection Regulation). In the case of a legal person, the personal data of the contact person are processed on the basis of the consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation). The controller issues a receipt or invoice for the value of the products it has distributed. The receipt does not contain personal data. The invoice will contain the name, address and possibly the tax number of the data subject. The issuing of the invoice is a statutory obligation of the controller. The legal basis for the processing of personal data on the invoice is therefore the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). The personal data on the invoice are stored by the controller for 8 years in compliance with the retention obligation laid down in Article 169 of the Accounting Act.

The contact form used on the www.zsambokibiokert.unas.hu website:

On the website, the visitor of the site has the possibility to contact the data controller by means of a contact form. In the form, the name, e-mail address and telephone number of the interested party must be provided. The purpose of processing personal data is to contact the site visitor and the person interested in the controller's products. If no order is placed after contacting the data controller,

the personal data of the interested party will be deleted immediately, but within 3 working days at the latest. The controller processes the personal data for the purpose of concluding the contract on this legal basis (Article 6(1)(b) of the General Data Protection Regulation). By filling in the form, the data subject declares that he or she has read the controller's Privacy Policy and acknowledges the contents thereof.

Personal data processing when you comment on blog posts:

The data controller publishes its blog posts on the website www.zsambokibiokert.hu. After logging in, you can add comments to the entries by entering your name and e-mail address. By posting a comment and entering personal data, the data subject gives his/her consent to the processing of his/her personal data and to its publication on the website by ticking the box provided. The legal basis for the processing of personal data is the data subject's informed consent (Article 6(1)(a) of the General Data Protection Regulation). The data subject declares that he or she has read and understood the Controller's Privacy Notice and has taken note of the information contained therein. The controller shall not use the personal data for any other purpose and shall not make them available to third parties. The controller shall process the personal data thus recorded until the data subject's consent is withdrawn. If the data subject withdraws his or her consent, the controller shall delete the recorded personal data from its system without undue delay and at the latest within 3 working days.

The data subject declares on the website of the controller that he or she is 16 years of age or older when commenting on blog posts. A person under the age of 16 is not allowed to comment on the posts, given that, pursuant to Article 8(1) of the General Data Protection Regulation (GDPR), the validity of his/her consent to the processing of personal data requires the consent of his/her legal representative. The controller is not in a position to verify the age and entitlement of the person giving consent, so the data subject warrants that the data he or she has provided is accurate.

- **Subscribe to the newsletter:**

The data controller also offers the possibility to subscribe to a newsletter. By subscribing to the newsletter, the data subject declares that he or she has read the Data Controller's Privacy Policy and that he or she gives his or her consent to the processing of his or her personal data for marketing purposes (sending the newsletter). The data subject shall have the rights set out in the Data Protection Notice and shall be able to exercise those rights in the manner and at the places indicated therein. Accordingly, the legal basis for the processing of personal data in the context of sending the newsletter is the explicit and written consent of the subscriber (Article 6(1) (a) of the General Data Protection Regulation).

The purpose of data processing in connection with the sending of newsletters is to provide the recipient with complete general or personalised information about the latest news and news items published by the controller, in accordance with the applicable and valid legislation. Subscription to the newsletter and/or DM mailing is based on voluntary consent, the controller will of course give the data subject the opportunity to withdraw his or her consent and unsubscribe from the newsletter at any time.

The data subject declares on the controller's websites that he or she is at least 16 years of age when subscribing to the newsletter. A person under the age of 16 may not subscribe to the newsletter, given that, pursuant to Article 8(1) of the General Data Protection Regulation (GDPR), the validity of his/her declaration of consent to the processing of personal data requires the consent of his/her legal representative. The controller is not in a position to verify the age and entitlement of the person giving consent, so the data subject warrants that the data he or she has provided is accurate.

- **The social networking sites of the controller:**

The data controller also operates a Facebook page, where personal data are also processed. The data controller also promotes its activities and services on the Facebook page. This page is used by the controller for marketing purposes.

<https://www.facebook.com/zsamboki.biokert>

The controller also provides comprehensive personal support through Facebook. If you ask a question via Facebook, we will try to answer it as soon as possible. You will use the data you receive on Facebook only to answer your question and not for any other promotional purposes.

The purpose of using the Facebook page is to advertise and provide information on social media. Facebook may also use the data for its own purposes, including profiling and targeting the data subject with advertising.

In order to contact the controller via Facebook, you must be logged in. To do this, Facebook may also request, store and process personal data. The controller has no control over the type, scope and processing of this data and does not receive personal data from the Facebook operator. For more information on this, please visit the Facebook page.

The personal data of Facebook page followers are processed by the data controller on the basis of their consent (Article 6 (1) (a) of the General Data Protection Regulation), which is deemed to be given by the fact that the person concerned likes, follows or comments on the page and its posts.

Other community pages of the controller where the legal basis for processing is also the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation):

https://www.youtube.com/channel/UCQjOFgz_KLbv4Bi2iatrv1w

- **Personal data processing in the use of cloud-based applications:**

The data controller mainly uses cloud-based services for storing, sharing and backing up documents. A common feature of such services is that they are not provided by the user's computer, but by a remote server, a server centre located anywhere in the world.

Such services are also provided by online hosting. A major advantage of cloud applications is that they provide a highly secure, flexible and scalable IT storage and processing capacity, essentially independent of geographical location.

In these cases, the cloud service provider can be considered as a data processor, processing the personal data on behalf of the data controller. Cloud service providers are obliged to keep personal data confidential and may only process personal data on the instructions of the controller.

The data controller shall take the utmost care in the selection of its cloud service partners, shall take all measures reasonably necessary to ensure that they are contracted in a manner that is compatible with the data security interests of its customers, that their data management principles are transparent to them and that data security is regularly monitored.

Cloud storage is password protected and only the data controller has access to the data stored there.

The data controller's partners expressly consent to the transfer of data necessary for the use of cloud-based applications by accepting this Privacy Notice.

- **Handling of complaints about the controller's activities:**

The purpose of data processing in the course of complaint handling in relation to the activities of the data controller is to enable the communication of the complaint, to identify the data subject and his/her complaint, to record the data required by law to be recorded, to investigate the complaint and to maintain contact in connection with its resolution.

In case of a complaint, the processing of the complaint and thus of personal data is mandatory under Act CLV of 1997 on Consumer Protection. The legal basis for the processing of personal data is therefore the fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

The data controller will keep the record of the complaint and a copy of the response for 5 years, and will also process the personal data on that basis for that period.

- **Security of data processing:**

The data controller undertakes to ensure the security of the data, to take technical and organisational measures and to maintain procedural rules to ensure that the data recorded, stored or processed are protected and to prevent their destruction, unauthorised use or unauthorised alteration. It also undertakes to require any third party to whom it transfers or discloses the data to comply with the requirements of data security.

The controller shall ensure that the data processed cannot be accessed, disclosed, transmitted, modified or deleted by unauthorised persons. The data processed may only be accessed by the data controller and its data processor(s) and shall not be disclosed to third parties not entitled to access the data.

The data controller takes great care to ensure the security of the personal data of its partners and customers. It acts in full compliance with the legal provisions and requires all its partners to do the same. The protection of personal data includes physical protection (storage of documents in a lockable room, lockable cupboard) and IT protection (use of password protection).

The controller shall store the personal data provided by the data subject primarily on the servers of the data processor(s) specified in this Privacy Notice, equipped with the usual protection systems, and partly on its own IT equipment, or, in the case of paper media, at its headquarters, in an appropriately locked manner.

The data subjects acknowledge and accept that, if they provide their personal data, the data protection cannot be fully guaranteed on the Internet and in the computer system. In the event of unauthorised access or disclosure, despite the efforts of the controller, it is necessary to proceed as described in this notice.

- **Rights of data subjects:**

- **Transparent information:**

The purpose of this Privacy Notice is also to provide clear, concise, transparent and understandable information about the processing activities of the controller.

- **Right of access:**

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the following information:

- the purpose of the processing,
- the categories of personal data concerned,
- the recipients to whom the personal data have been disclosed,
- the intended duration of the storage of the personal data.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

- **Right to rectification:**

The data subject shall have the right to obtain from the controller, at his or her request, the rectification of inaccurate personal data relating to him or her.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

• **Right to erasure:**

The data subject shall have the right to obtain, at his or her request, the erasure of personal data relating to him or her. The controller shall, on the basis of such a request, erase the personal data if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected,
- the data subject withdraws his or her prior consent and there is no other legal basis for the processing,
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing,
- the personal data have been unlawfully processed,
- necessary to comply with a legal obligation under EU or national law.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

• **Right to restriction of processing:**

The data subject has the right to request the controller to restrict processing, in particular if:

- disputes the accuracy of the data,
- considers the processing to be unlawful, but for some reason does not request the deletion of the data.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

• **Right to data portability:**

The data subject has the right to receive personal data concerning him or her in a structured, commonly used, machine-readable format and the right to transmit such data to another controller.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

• **Right to object:**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of his or her personal data, as provided for in Article 21 of Regulation (EU) 2016/679 of the European Parliament and of the Council.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

• **The right of the data subject in case of automated decision-making:**

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 significantly affects him or her. Automated decision-making is any process or methodology whereby a technical automatism evaluates personal aspects relating to the data subject and which produces legal effects concerning him or her or significantly affects him or her. The controller shall not use IT automated mechanisms, including profiling, which have a significant impact on the rights of the data subject.

You can request information about the above data from the data controller at the following address, e-mail address:

Naspolyafa Ltd. 2116 Zsámbok, Szent László utca 56.

E-mail: info@zsambokibiokert.hu

The controller hereby informs you that it will respond to your request within 30 days. Information requests sent by post will be answered by post, requests sent by e-mail will be answered by e-mail.

The controller undertakes to inform any recipient of requests sent to it in connection with the above rights to whom it has disclosed the personal data, unless this proves impossible. It also undertakes to notify the data subject (applicant) of the decision on the processing of the above requests within 30 days at the latest.

- **Data protection incident:**

A personal data breach is 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.

In the event of a data breach, the level of data breach must be at a serious risk level, i.e. the breach must be of a degree that personal data:

- destruction,
- with the loss of,
- by changing,
- unauthorised disclosure or
- involves unauthorised access to.

An incident is considered to occur if any one of the above occurs, but this does not exclude that more than one of the above may occur at the same time. This includes not only intentional malicious conduct but also negligent injuries. An incident therefore occurs when it is caused by an accidental or unlawful act.

Examples of data breaches include:

- the unlawful transmission of personal data on a document, portable device, storage medium or computer system (e.g. by mail),
- unauthorised access to a computer system or application that processes personal data,
- damage to or loss of part or all of a database containing personal data,
- part or all of an IT system rendered unusable by a virus or other malicious software, etc.

A data breach may cause physical, pecuniary or non-pecuniary damage to natural persons, including loss of control over their personal data or restriction of their rights, discrimination, identity theft, if not addressed in an appropriate and timely manner, or misuse of identity, financial loss, unauthorised impersonation, damage to reputation, damage to the confidentiality of personal data protected by professional secrecy, or other significant economic or social disadvantages suffered by the natural persons concerned.

In the event of a potential data breach (unless the data breach is unlikely to pose a risk to the rights and freedoms of natural persons), the controller shall immediately notify the National Authority for Data Protection and Freedom of Information. As soon as the controller becomes aware of the incident, it shall notify it without undue delay and, if possible, no later than 72 hours after becoming aware of the personal data breach. If the notification cannot be made within 72 hours, the notification shall state the reason for the delay and provide the required information in detail without further undue delay.

The National Authority for Data Protection and Freedom of Information operates a dedicated system on its website for the notification of data breaches, through which notifications can be made electronically.

The data controller shall keep a record of the data breaches, indicating the facts relating to the data breach, its effects and the measures taken to remedy it. The controller shall keep records of the data relating to the incidents, including the causes, the events and the personal data involved. In addition, the record should also include the effects and consequences of the incidents and the measures taken to remedy them, and the conclusions of the controller (for example, why it thinks the incident is not reportable, or if the notification is delayed, the reason for the delay).

An incident that is unlikely to pose a risk to the rights and freedoms of natural persons does not need to be notified to the supervisory authority.

If the data breach is likely to result in a high risk to the rights and freedoms of the data controller's partners, customers, clients, we will inform the affected partner without delay. The information provided to the data subject shall clearly and plainly describe the nature of the personal data breach and shall include the most relevant information and measures.

The data subject need not be informed as described above if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational protection measures and those measures have been applied in relation to the data affected by the personal data breach, in particular measures to render the data unintelligible to persons who are 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 a similar measure should be taken to ensure that the data subjects are informed in an equally effective manner.

- **Information on the relevant legislation:**

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

- 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, GDPR);
- Act V of 2013 - on the Civil Code (Civil Code);
- Act C of 2000 on Accounting (Accounting Act).

• **Right to apply to the courts:**

The data subject may take the controller to court if his or her rights are infringed. The court shall rule on the case out of turn.

• **Data protection authority procedure:**

You can lodge a complaint with the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Seat: 1055 Budapest, Falk Miksa u. 9-11.

Address for correspondence: 1363 Budapest, Pf. 9.

Telephone: 0613911400

Fax: 0613911410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

• **Other provisions:**

The data controller shall provide information on data processing not listed in this notice at the time of recording the data. In such cases, the provisions of the applicable legislation shall prevail.

The data controller hereby informs its customers that the court, the prosecutor, the investigating authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, the National Bank of Hungary, or other bodies authorized by law may contact the data controller to provide information, to disclose or transfer data, or to provide documents. The controller shall disclose to the authorities - if the authority has indicated the precise purpose and scope of the data - personal data only to the extent and to the extent strictly necessary for the purpose of the request.

The website of the Data Protection Authority contains further information on the data protection rights referred to in this Privacy Notice.

Zsámbok, 2020.

Hayes Matthew
Managing Director

- ANNEX NO.

Ssz.	Name of the processing of personal data	Purpose of data processing	Legal basis for processing	Time limit for deletion of personal data
1.	Personal data provided during purchase and registration in the online shop.	For the purposes of the performance of the contract, for the purpose of contacting.	Performance of the contract (Article 6(1)(b) of the General Data Protection Regulation).	Within 30 days of the legal obligation to keep the data (8 years).
2.	Personal data of the contact person of the legal person when shopping and registering in the online shop.	To fulfil contractual obligation.	Based on the consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation).	In case of withdrawal of consent, without delay. Within 10 working days after the termination of the contract, unless the law provides for an obligation to keep the contract (within 30 days after the expiry of the obligation).
3.	Personal data provided when placing an order on the	For the purposes of the	Performance of the contract	Within 30 days of the legal

- www.szatyorbolt.hu website. performance of (Article 6(1)(b) obligation to keep the contract, for of the General the data (5 the purpose of Data years). contacting. Protection Regulation).
- In case of withdrawal of consent, without Based on the delay. Within 10 data subject's working days after consent the termination of a (Article 6(1)(a) the contract, of the General unless the law Data provides for an obligation to keep the contract (within 30 days after the expiry of the obligation).
4. Personal data of the contact person of the legal person when placing an order on the website www.szatyorbolt.hu. To fulfil contractual obligation.
5. Personal data on the invoice issued to the purchaser (in the case of a natural person or sole trader). Fulfilling a legal obligation, issuing an invoice. (Article 6(1)(c) the legal obligation to keep the data (8 years). Data Protection Regulation).
6. Processing of incoming emails (sender's email address), telephone numbers. To fulfil contractual obligation (the order) or on the basis of consent. Fulfilling a legal obligation (Article 6(1)(b) of the General Data Protection Regulation) or the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation). Performance of a contractual obligation (Article 6(1)(b) of the General Data Protection Regulation) or immediately after withdrawal of consent, up to a maximum of 3 working days. Within 10 working days of the completion of the task, or
7. Personal data of suppliers, service providers, subcontractors (in the case of an individual or sole trader). To fulfil contractual obligation. Fulfilling a contractual obligation (Article 6(1)(b) of the General Data Protection Regulation). Within 30 days of the legal obligation to keep the data (8 years).
8. Personal data of contact persons of suppliers, service providers, subcontractors. To fulfil contractual obligation. Fulfilling a contractual obligation (Article 6(1)(b) of the General Data Protection Regulation). In case of withdrawal of consent, without Based on the delay. Within 10 data subject's working days after consent the termination of a (Article 6(1)(a) the contract, of the General unless the law Data provides for an obligation to keep the contract (within 30 days after the expiry of the obligation).
9. Personal data recorded during the collection of data by the user experience, cookies processed by the websites. Improving the consent (Article 6(1)(a) withdrawal of consent, but within 3 working days at the latest. Data Protection Regulation). Without undue delay after the withdrawal of consent, but within 3 working days at the latest.
10. Personal data (name, e-mail address, telephone number) provided when using the contact form on the www.zsambokibiokert.unas.hu website. To contact. Creation of the contract (Article 6(1)(b) of the General Data Protection Regulation). Immediately after contact, but within 3 working days at the latest.

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| 11. | Personal data (name, e-mail address) provided when you comment on blog posts on the www.zsambokibiokert.hu website. | To indicate the | Consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation). | Without undue delay after the withdrawal of consent, but within 3 working days at the latest. |
| 12. | Personal data (name, e-mail address) provided when subscribing to the newsletter. | To send a | Based on the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation). | Immediately after the withdrawal of consent. |
| 13. | Personal data that have come to the knowledge of the data controller through the use of social networking sites. | To promote and | Based on the data subject's consent (Article 6(1)(a) of the General Data Protection Regulation). | Immediately after the withdrawal of consent. |
| 14. | The images included in photographs and video recordings of customers. | Promotion of products and activities, use of the footage on websites, social media and other media. | Consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation). | Without undue delay after the withdrawal of consent, but within 3 working days at the latest. |
| 15. | Personal data collected in the course of complaint handling. | To identify and address the | Compliance with the legal obligation (Article 6(1)(c) of the General Data Protection Regulation). | Within 30 days of the legal obligation to keep the data (5 years). |