

Privacy Policy

Version 1

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Volanpack Ltd

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(Hereafter Data controller)

The purpose of this policy is to set out the principles by the Data controller, with special regard to the collection, processing, managing and the possible transferring of personal data, taking into account the following:

- EU Regulation 2016/679 (on the protection of natural persons with regard to the handling of personal data and on the free movement of such data), i.e. GDPR
- Act CXII of 2011 on the Right of Information Self-Determination and Freedom of Information (Info Law)

and act in accordance with its provisions.

The Privacy Policy (hereafter policy) builds an integral part of the contract or order between the data controller and his customer.

By signing the contract and / or order with the data controller, the customer acknowledges to have read and understood the contents of the policy and agrees on processing and keeping records of the data provided to the data controller in accordance with applicable law; at the same time, the customer agrees that their contact details will be recorded in the database of the data controller in compliance with legal obligations, as well as for business and communication purposes to receive information about their services, products, and changes.

I. Definitions

The following concepts are defined in the GDPR, of which the following concepts should be highlighted in accordance with the nature of this policy's regulations

- a) **personal data**: means any information related to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- b) **processing**: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- c) **controller**: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- d) **processor**: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- e) **third party**: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- f) **consent**: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

II. Persons / organisations involved in the Data Management

In the data management only natural or legal persons, organisations with no legal identity are involved, who or which subscribe to the newsletter services or voluntarily submit data as subscribers, purchasers or inquirers through the website.

III. Data Processor

The data processing and controlling is carried out within the European Union. The data controller reserves the right to use a data processor for its data management. The data processor shall treat personal data with appropriate security, which shall be communicated to the data controller in written form.

If the data controller transfers the personal data to a data processor for further use and the contract expires, the processor must delete it immediately and notify the data controller in written form.

IV. Data transfer

We only share information with other third parties if

- we have the consent of the data subject;
- it is required by law; or
- it is necessary for legal proceedings or issues related to them or for the sake of exercising or protecting rights provided by the law.

As soon as the lawful conditions of data processing and transfer cease, the data processor shall promptly take action to delete the personal data from the database and sends a notification of the cancellation.

V. Persons entitled to access the data

By signing a contract or placing an order with the data controller you specifically consent to let your personal data be known and processed by the data controller's employees, executives, consultants, data processors or other operatives, furthermore their partners whom you consented to transfer data.

VI. Notification of data change

You are entitled and at the same time obliged to announce changes in the data managed by the data controller within 15 days. The data subject is solely responsible for the consequences of the failure of notification.

VII. Rights of the data subject and how to enforce them

1. Request for information

The data subject may request information on the personal data managed by the data controller, on their source, the purpose, the legal basis, the period of the data processing, the transfer of the data to a third party and its legal basis and recipient.

Requests for information may be made in written form by post or electronically, using the data protection identifier of the data subject. The data controller shall provide the information in written form to the address given by the data subject as soon as possible, but in any case within 30 days.

Please note that information on a particular data set is provided annually free of charge, but further information may be charged by the data controller.

2. Right of rectification

If the data subject informs the Data controller that the personal data being processed is incorrect, specifying the personal data at the same, or the Data controller becomes aware of any personal data errors and the correct data in another way, the Data controller shall correct the personal data. The Data controller shall notify the data subject of the rectification or rejection of his / her request for rectification.

3. Right to Erasure or Restriction

The data subjects have the right to request the erasure or restriction of their personal data. Personal data shall be restricted if it is presumed that deletion would harm the legitimate interests of the person in concern based on the available information. The restricted personal data will only be processed until the purpose which excluded its erasure exists. The data subject shall be informed of the erasure or restriction, or the dismissal of the request for erasure or restriction.

4. Right to Object

The data subject has the right to object to processing of their personal data – except the mandatory data processing,

- if the processing or transfer of their personal data is necessary only for the performance of a legal obligation which the controller is subject to, or for the fulfilment of a legitimate interest of the controller or of a third party, or
- if their personal data are used or transferred for direct marketing, opinion polling or scientific research, unless they have given their consent or
- in other cases specified by law.

The controller shall investigate the objection as soon as possible, but at most within 30 days of the request, make a decision on its grounding and inform the data subject in written form.

If the objection is grounded the controller shall no longer process the data - including further recording and transfer – he locks the data and informs anyone whom he / she has transferred the data concerned with the objection about the fact of the objection or the actions taken, and who are required to take actions to enforce the right of objection.

5. Right to object to direct marketing

The data subjects are entitled to refuse to consent to direct marketing newsletters which aim at directly gaining business any time without justification. In doing so, they have the right to refuse or prohibit their names being included in the list of contacts or acquisitions, to use for direct business purposes which include profiling to an extent that is related to direct marketing, or transfer to a third party.

6. Right to Portability

The right to portability applies to the data subject in case of consent or contractual data processing on legal basis when the data processing is done in an automated way.

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

VIII. Data processing for tax and accounting purposes

Volanpack Ltd processes data of natural persons required by law for tax and accounting (bookkeeping, taxation) purposes who get into business contact with it as a customer or supplier to fulfil legal obligations.

Processed data:

- name
- address
- tax identification number (if required)

Based on the law on Accounting section 167 of Act C of 2000:

- name
- address
- identification of the person or organization requesting the transaction
- the payer and the person certifying the fulfilment of the provision,
- depending on the organisation the signature of the supervisor;
- on the cashier's receipts the recipient, on the receipt the payer's signature.

The legal basis for the data processing: required by law

The recipients of the personal data: the leaders, employees, data processor of Volanpack Ltd

Period of storing personal data: based on the law Under section 169 (2) of Act C of 2000, at least 8 years

IX. Websites

Volanpack Ltd operates 2 websites to promote the company's products and services.

On the website **volanpack.eu** the request for quotation and getting in contact is voluntary. We ask for the following data when registering for the purpose of keeping in contact:

- name
- e-mail address
- phone number
- county

The legal basis for the data processing: consent of the data subject

The recipients of the personal data: the leaders, data processors, assigned employees of Volanpack Ltd, operators of the websites

Period of storing personal data: until the withdrawal of the consent of the data subject

On the **fitokondi.hu** website getting in contact, request for quotation, asking for information and shopping in the webshop is voluntary.

We ask for the following data when getting in contact or asking a question, also for the sake of keeping in contact:

- name
- e-mail address
- telephone number

The legal basis for the data processing: consent of the data subject

The recipient of the personal data: the leaders, data processors, assigned employees of Volanpack Ltd, operators of the websites

Period of storing personal data: until the withdrawal of the consent of the data subject

When making purchases in the **webshops**, the Data controller enables the data subjects to register on their website, facilitating the process of using the services available through the website. We ask for the following data to register:

- name
- telephone number
- mobile phone number
- e-mail address
- password
- address (zip code, city, street, number, floor)
- other questions, requests
- selected communication channel (electronic, paper form)
- mode of delivery
- method of payment

The legal basis for the data processing: consent of the data subject

The recipients of the personal data: the leaders, data processors, assigned employees of Volanpack Ltd, operators of the websites

Period of storing personal data: until the withdrawal of the consent of the data subject

We ask for the following data when ordering products:

- name
- e-mail address
- country
- city
- address
- county

- phone number
- mode of delivery (pick up, delivery service)
- method of payment (bank transfer, collect on delivery)

Volanpack Ltd. issues an invoice for the completed product order.

The legal basis for the data processing: consent of the data subject

The recipients of the personal data: the leaders, data processors, assigned employees of Volanpack Ltd, operators of the websites

Period of storing personal data: Under section 169 (2) of Act C of 2000, at least 8 years

The Data controller transfers the following data to a third party to complete the order:

- name
- address
- phone number.

The legal basis for the data processing: consent of the data subject

The recipients of the personal data: assigned third party (delivery service, etc)

The provider of the services takes responsibility for the security of the personal data.

Using Cookies

Cookies are alphanumeric information packages with variable content sent by a website that are stored on a user's computer for a predetermined period. The use of cookies provides the possibility to query a visitor's information and to monitor their Internet usage. Cookies can thus be used to accurately determine the interest of the user and their Internet usage habits and website visit history. Since cookies act as a kind of tag that identifies a visitor returning to the site, the username and password can be stored by using them. If, during a site visit, the user's browser returns a cookie previously saved to the hard disk, the webserver sending it may link the current visit to the previous ones, however, since cookies are linked to a domain, they can only do so for their own content. Cookies alone are not capable of identifying the user, they are only capable of recognizing the visitor's computer.

Types of cookies by their validity and origin:

- Session cookie
The validity of session cookies is limited only to the current session of the user; their scope is to prevent data loss (for example when filling out a longer form). When the session ends or the browser is closed this type of cookie gets automatically deleted from the visitor's computer.
- Persistent / saved cookie

Persistent cookies are set to expire in days, weeks, months or years. During the period of validity, the saved cookies are stored on the hard disk of the user's computer, but may be deleted by the user prior to the expiration date.

- First-party and Third-party cookies

Normally, a cookie's domain attribute will match the domain that is shown in the web browser's address bar. This is called a first-party cookie. A third-party cookie, however, belongs to a domain different from the one shown in the address bar.

On the first visit to the website Volánpack Zrt. informs its visitors about the use of cookies and then the visitor can decide what kind of cookies he/she wants to use. More information about cookies can be found in the 'Further Information' menu.

X. Using social networking (Facebook)

- a) The Volanpack Ltd operates a Facebook page to promote its products and services.
- b) Asking a question in a Facebook post does not qualify as an official complaint.
- c) Personal data published by visitors on Volanpack Ltd's Facebook page will not be processed by the company.
- d) Visitors are subject to the Facebook Privacy Policy and Terms of Service.
- e) In case of publishing unlawful or offensive content Volánpack Zrt. may disqualify or delete a member without prior notice
- f) Volanpack Ltd is not responsible for data content or comments that violate the laws published by Facebook users. Volanpack Ltd is not responsible for any errors, malfunctions caused by the operation of Facebook or any problems from the changes of the system of Facebook.

The legal basis for the data processing: consent of the data subject

The recipients of the personal data: the leaders, employees, data processors of Volanpack Ltd

Period of storing personal data: until the withdrawal of the consent of the data subject

XI. Newsletter

By ordering the data controller's service and giving their e-mail address in the contract or order the data subject gives consent to the data controller to send him professional materials and other company related information and notices to their email address in form of a newsletter. Signing up is voluntary and can be cancelled any time via email or a link.

The data controller creates a database (name, email address) of the data subjects who provide their business / private data as contact information and Volanpack Ltd sends newsletters to the organisations included in the database (to the business email address of the contact persons). The contact details provided during subscription will be stored by the data controller in its customer relationship management system - on servers located within the European Union - and will be kept in confidential and will not be made available to unauthorized persons.

The controller reserves the right to exclude anyone from the newsletter at any time. In case the email address in the contract is not a business e-mail address the data controller deletes the subscription and the data immediately after becoming aware of it and excludes the organization or the contact person concerned from sending a newsletter.

The data controller will store the data as long as the data subject asks for their cancellation

XII. Right to lodge complaint

Complaints related to the protection of personal data and issues related to data management can be referred to the Hungarian National Authority of Data Protection and Freedom of Information H-1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest Pf.:9) and to a court of appeal.