

# Privacy Policy

## DATA PROTECTION

### Information on data management for purchases in the Imagine Lovas webshop

When shopping at [www.imaginelovas.hu](http://www.imaginelovas.hu), you provide personal data, which is protected by Act CXII of 2011 on the right to informational self-determination and freedom of information. Act (hereinafter: "Infotv."), European Parliament and Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, as well as on the repeal of Regulation 95/46/EC General Data Protection Regulation (hereinafter: "GDPR"), CVIII of 2001 on certain issues of electronic commercial services and services related to the information society. Act (hereinafter: "Eker. tv"), Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activity. Act (hereinafter: "Grt."), Act C of 2000 on Accounting (hereinafter: "Accounting Act"), Act CXXVII of 2007 on General Sales Tax. Act (hereinafter: "VAT"), as well as Act V of 2013 on the Civil Code (hereinafter: "Ptk") and CLV of 1997 on consumer protection. Act (hereinafter: "Regulation Act"), as well as CLIX of 2012 on postal services. act ("Postatv")) In accordance with the provisions of the referenced legislation, we hereby inform you of the details of the management of your personal data, as well as your related rights.

## 1. PERSONNEL OF THE DATA PROCESSOR

Imagine Kft. (headquarters: 1088 Budapest Rákóczi út 29., company registration number: 01-09-903573, phone: +36 1 250 1785, e-mail: [info@imaginelovas.hu](mailto:info@imaginelovas.hu), web address: [www.imaginelovas.hu](http://www.imaginelovas.hu), hereinafter: "Data controller")

The Data Controller determines the scope, purpose and duration of the data requested during shopping in the webshop and the other essential conditions of data management in Sections 3-4. for the purposes specified in point.

## 2. PROVIDING YOUR DATA IS VOLUNTARY

You are not obliged to provide your personal data, but if they are not provided, you cannot purchase the products or services available in the webshop.

## 3. SCOPE OF PROCESSED DATA, PURPOSE AND DURATION OF DATA PROCESSING

After registering and logging in, you can make purchases on the Data Controller's website. You can register and log in with a user account created on the website of the Data Controller, or with existing registrations with external service providers.

### I. Registration on the website

#### The processed data:

##### 1. Basic data:

mandatory: e-mail address, telephone number, default language of correspondence

optional: username, gender, date of birth

##### 2. Billing address(es):

mandatory: last name, first name, phone number, address, country, postal code, town, street, house number

optional: tax number

##### 3. Delivery address(es):

mandatory: (last name, first name, phone number, address (country, postal code, town, street, house number)

required: e-mail address

User-specified password (stored encrypted)

#### Purpose of data management:

- online product sales,
- documenting the purchase and payment,
- fulfilling the accounting obligation,
- identification of the user as a customer and contact with him,
- fulfillment of the ordered product (or service), invoicing,
- the possibility of processing the payment

#### Duration of data management:

- until the contract is fulfilled,
- until the consent of the person concerned is withdrawn, failing that

the Data Controller processes the data after the date of purchase, Ptk. 6:22 a.m. will be deleted after 5 years pursuant to § If the data is transferred by the Data Controller to Account TV. is obliged to keep the data, then the Data Controller will only delete the data after 8 years after the termination of the user account, regardless of the data subject's consent.

The consent can be withdrawn at any time by sending a message to the e-mail address [info@imaginelovas.hu](mailto:info@imaginelovas.hu).

#### Legal basis for data management:

- until the contract is fulfilled,
- until the consent of the person concerned is revoked, failing that
- the Data Controller processes the data after the date of purchase, Ptk. 6:22 a.m. will be deleted after 5 years pursuant to § If the data is transferred by the Data Controller to Account TV. is obliged to keep the data, then the Data Controller will only delete the data after 8 years after the termination of the user account, regardless of the data subject's consent.
- Consent can be withdrawn at any time by sending a message to the e-mail address [info@imaginelovas.hu](mailto:info@imaginelovas.hu).

#### legal basis:

- in the case of online product sales, the data subject's consent is, Info. TV. Pursuant to § 5 (1) point a) and Article 6 (1) point a) of the GDPR, as well as performance of a contract pursuant to Article 6 (1) point b) of the GDPR
- documentation of the purchase and payment, fulfillment of accounting obligations, and fulfillment of legal obligations during invoicing and payment are GDPR Article 6 (1) point c) and Accounting. TV. Paragraph (2) of § 169 and the VAT Act. Based on § 169
- during the identification of the user as a customer and the contact with him and the fulfillment of the ordered product (or service)
- the consent of the person concerned is, Info. TV. § 5 (1) point a) GDPR Article 6 (1) point a) and contract performance based on GDPR Article 6 (1) point b)
- in the case of filtering out transactions suspected of abuse during online payment, a legitimate interest based on point (f) of Article 6 (1) of the GDPR

## **II. Registration on the website**

### **The processed data:**

Personal data provided during the operation of e-mail, fax and telephone customer service

e-mail address, name, residential address (country, city, postal code, street, house number), telephone number and other personal data received by customer service by e-mail concerning the user or other affected person and the circumstances of the case.

### **Purpose of data management:**

Investigating and accurately documenting the matter received for contact, or accurately documenting the telephone conversation with the telephone customer service, in order to provide the Data Controller with the requests and comments related to the Data Controller's activities. Communication by email is archived, so that in the event of any subsequent question or dispute, the information is available in its original form and, if necessary, the Data Controller can contact the user in connection with the case.

### **Duration of data management:**

- until the consent of the person concerned is revoked, failing that

- the date of receipt by the Data Controller of the request received by e-mail from the customer service to the Data Controller, or after the telephone conversation, Ptk. 6:22 a.m. will be deleted after 5 years pursuant to §

If the data is transferred by the Data Controller to Account TV. is obliged to keep the data, then the Data Controller will only delete the data, regardless of the data subject's consent, after the date of receipt of the case at the Data Controller or 8 years after the telephone conversation.

The consent can be withdrawn at any time by sending a message to the e-mail address [info@imagineiovas.hu](mailto:info@imagineiovas.hu).

### **Legal basis for data management**

The legal basis for handling data handled during customer service activities is the consent of the data subject, Info. TV. § 5 (1) point a), Article 6 (1) point a) of the GDPR, and performance of a contract based on Article 6 (1) point b) of the GDPR, fulfillment of a legal obligation Article 6 (1) of the GDPR ) paragraph c) and Fgy. TV. Based on § 17/A.

## **4. PROFILE CREATION**

Based on consent, the Data Controller performs profiling in order to be able to provide you with offers tailored to your needs, wishes and interests. You can send the offers via newsletter, e-mail or display them on the website. Profiling is any form of automated processing of personal data, during which personal data is used to evaluate certain personal characteristics of the user (e.g. characteristics related to personal preferences, interests, health, behavior, location or movement), analysis or prediction.

## **5. PERSONS WHO HAVE ACCESS TO PERSONAL DATA**

The data may be accessed by the Data Controller's employees dealing with the marketing area, as well as by additional data processors named in this Information Extract, in order to perform their duties. Thus, for example, the administrator of the Data Controller and the data processors named in this information can learn about personal data for the purpose of case management and data processing.

Web analytics services also use cookies, the purpose of which is to help analyze the use of online interfaces. On the online interfaces, the data subject allows the information created by cookies and related to the use of the online interface to be transmitted by Google Analytics and Google Adwords to Google's servers in the United States of America. Other managed cookies are stored on servers within the European Union. By giving the separate consent provided on the website, the user consents to the collection and analysis of his data in the manner and for the purposes specified above. The above service providers use this information to evaluate and analyze the use of the online interfaces by the person concerned, to compile reports on the activities performed on the online interfaces, and to provide other services related to the activities performed on them and Internet use.

## **6. DATA TRANSMISSION**

6.1. When products are delivered, the recipient's name, address, and the value of the order will be forwarded to the following recipients:

Name: GLS General Logistics Hungary Kft.

Headquarters: 2351 Alsónémedi, GLS Európa utca 2.

Email address: [info@glh-hungary.com](mailto:info@glh-hungary.com)

Mailing address: 2351 Alsónémedi, GLS Európa utca 2.

6.2. Your data will not be forwarded to third parties beyond the above. Data is forwarded to a third party or recipient in the event that we inform you in advance about the potential recipient and you subsequently consent to this in advance, or otherwise it is required by law.

6.3. During this data management activity, we do not forward personal data to third countries or international organizations.

## **7. DATA SECURITY MEASURES**

The Data Controller is obliged to take care of the security of the data, and also takes the technical and organizational measures and establishes the procedural rules that ensure that the recorded, stored and managed data are protected, as well as prevent their destruction, unauthorized use and unauthorized changes. Furthermore, it calls on the third parties to whom the data concerned has been transmitted, that they are obliged to comply with the requirement of data security.

The Data Controller ensures that no unauthorized person can access, disclose, transmit, modify, or delete the managed data.

The Data Controller will do everything possible to ensure that the data is not damaged or destroyed. The Data Controller imposes the above commitment on its employees participating in its data management activities, as well as data processors acting on behalf of the Data Controller.

The Data Controller's computer systems and other data storage locations for the website [www.imagineiovas.hu](http://www.imagineiovas.hu) are operated by BRAINSTORMING DESIGN Bt. (1154 Budapest, Damjanich János utca 92.).

In order to prevent unauthorized persons from accessing your data, the Data Controller ensures the preservation of personal data and prevents unauthorized access as follows: access to the server and computers is password protected.

## **8. NOTIFICATION OF THE DATA PROTECTION INCIDENT**

Data protection incident: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise handled.

If the data protection incident is likely to involve a high risk for the rights and freedoms of natural persons, the Data Controller shall

inform the data subject about the data protection incident in a clear and understandable manner without undue delay.

The data subject does not need to be informed if any of the following conditions are met:

- a) the data controller has implemented appropriate technical and organizational protection measures, and these measures have been applied to the data affected by the data protection incident, in particular those measures - such as the use of encryption - that are incomprehensible to persons not authorized to access personal data they make the data;
- b) after the data protection incident, the data controller has taken additional measures to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialize in the future;
- c) information would require a disproportionate effort. In such cases, the data subjects must be informed through publicly published information, or a similar measure must be taken that ensures similarly effective information to the data subjects.

## 9. RIGHTS AND LEGAL REMEDIES OF THE PERSPECTIVES

In addition to the rights set out above regarding the use of the recordings, the data subjects may exercise the following rights in connection with the data management according to this information:

Right to information and access to processed personal data:

The data subject is entitled to receive feedback from the Data Controller as to whether his personal data is being processed, and if such data processing is underway, he is entitled to access the personal data and the following information:

- a) the purposes of data management;
- b) categories of personal data concerned;
- c) the recipients or categories of recipients to whom or to whom the personal data has been or will be communicated, including in particular recipients in third countries and international organizations;
- d) where appropriate, the planned period of storage of personal data, or if this is not possible, the criteria for determining this period;
- e) the right of the data subject to request from the data controller the correction, deletion or restriction of processing of personal data concerning him and to object to the processing of such personal data;
- f) the right to submit a complaint to a supervisory authority;
- g) if the data were not collected from the data subject, all available information about their source;
- h) the fact of automated decision-making, including profiling, as well as, at least in these cases, comprehensible information about the logic used and the significance of such data management and the expected consequences for the data subject.

If personal data is transferred to a third country or to an international organization, the data subject is entitled to receive information about the appropriate guarantees regarding the transfer.

The Data Controller makes a copy of the personal data subject to data management available to the data subject. For additional copies requested by the data subject, the Data Controller may charge a reasonable fee based on administrative costs. If the data subject submitted the request electronically, the Data Controller will provide the information in a widely used electronic format, unless the data subject requests otherwise.

The right to request a copy mentioned in the previous paragraph cannot adversely affect the rights and freedoms of others.

The rights according to the above can be exercised through the contacts indicated in point I above.

Right of rectification:

At the request of the data subject, the Data Controller shall correct inaccurate personal data of the data subject without undue delay. Taking into account the purpose of the data management, the data subject is entitled to request the addition of incomplete personal data, including by means of a supplementary statement.

Right to erasure ("forgetfulness"):

If one of the following reasons exists, the data subject has the right to request that the Data Controller delete his/her personal data without undue delay:

- a) personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- b) the data subject withdraws the consent that forms the basis of the data management, and there is no other legal basis for the data management;
- c) the data subject objects to the data processing and there is no overriding legal reason for the data processing or if the data processing is related to direct business acquisition;
- d) personal data were handled unlawfully;
- e) personal data must be deleted in order to fulfill the legal obligation prescribed by EU or Member State law applicable to the data controller;
- f) the collection of personal data took place in connection with the offering of services related to the information society.

Data deletion cannot be initiated if data management is necessary:

- a) for the purpose of exercising the right to freedom of expression and information;
- b) fulfillment of the obligation according to the EU or member state law applicable to the data controller requiring the processing of personal data, or in the public interest;
- c) for preventive health or occupational health purposes, to assess the employee's ability to work, establish a medical diagnosis, provide health or social care or treatment, or manage health or social systems and services, based on EU or member state law or pursuant to a contract with a health professional and this data is handled by a professional or under the responsibility of a professional who is subject to the professional confidentiality obligation defined in EU or Member State law, or in the rules established by competent Member State bodies, or by another person who is also under EU or Member State law, or is subject to the obligation of confidentiality defined in the rules established by the competent Member State bodies;
- d) for reasons of public interest in the field of public health, such as protection against serious health threats that spread across borders or ensuring the high quality and safety of health care, medicines and medical devices, and is done on the basis of EU or Member State law that is appropriate and specific provides for measures for guarantees protecting the rights and freedoms of the data subject, and in particular regarding professional confidentiality;
- e) on the basis of the public interest affecting the field of public health and the handling of these data is carried out by a professional or under the responsibility of a professional who is subject to the professional confidentiality obligation defined in EU or Member State law, or in the rules established by the competent Member State bodies, or any other person by who is also subject to the obligation of confidentiality defined in EU or Member State law, or in the rules established by the competent Member State bodies;
- f) archiving in the public interest, for scientific and historical research purposes or for statistical purposes, if the right to erasure would likely make this data management impossible or seriously endanger it; obsession
- g) to present, enforce and defend legal claims.

**The right to restrict data processing:**

At the request of the data subject, the Data Controller restricts data processing if one of the following conditions is met:

- a) the data subject disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the data subject to check the accuracy of the personal data;
- b) the data management is illegal and the data subject opposes the deletion of the data and instead requests the restriction of their use;
- c) the Data Controller no longer needs the personal data for the purpose of data management, but the data subject requires them to

present, enforce or defend legal claims; obsession

d) the data subject objected to the data management in connection with the Data Manager's data management based on public interest or legitimate interest; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

If data management is subject to restrictions based on the above, such personal data, with the exception of storage, will only be processed with the consent of the data subject, or for the presentation, enforcement or defense of legal claims, or for the protection of the rights of another natural or legal person, or for the important public interest of the Union or a member state can be handled.

The Data Controller informs the data subject at whose request the data management has been restricted on the basis of the above in advance of the lifting of the restriction of data management.

**Right to data portability:**

The data subject has the right to receive the personal data concerning him/her provided to the Data Controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without the Data Controller, whose provided personal data to you if:

a) data management is based on consent or contract; and

b) data management takes place in an automated manner.

When exercising the right to data portability as described above, the data subject is entitled to - if this is technically feasible - request the direct transmission of personal data between data controllers.

Exercising the right to data portability cannot violate the right to erasure ("forgetfulness"). The aforementioned right does not apply if the data processing is in the public interest or is necessary for the execution of a task performed in the context of the exercise of the public authorities granted to the data controller.

The right to data portability must not adversely affect the rights and freedoms of others.

**Right to protest:**

The data subject has the right to object to the processing of his personal data by the Data Controller at any time for reasons related to his own situation, if the legal basis of the data processing is the public interest or the execution of a task performed in the framework of the exercise of public authority vested in the Data Controller, or the need to assert the legitimate interests of the Data Controller or a third party, including profiling based on the aforementioned provisions. In this case, the Data Controller may no longer process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are related to the submission, enforcement or defense of legal claims.

If personal data is processed for direct business acquisition, the data subject has the right to object at any time to the processing of personal data concerning him for this purpose, including profiling, if it is related to direct business acquisition. If the data subject objects to the processing of personal data for the purpose of direct business acquisition, then the personal data may no longer be processed for this purpose.

If personal data is processed for scientific and historical research purposes or for statistical purposes, the data subject has the right to object to the processing of personal data concerning him for reasons related to his own situation, unless the data processing is necessary for the performance of a task carried out for reasons of public interest.

**Right of withdrawal:**

The data subject has the right to withdraw his consent at any time if the Data Controller's data processing is based on the consent of the data subject. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

Procedure in the event of a stakeholder request related to the exercise of the above rights:

The Data Controller shall inform the data subject without undue delay, but in any case within one month of the receipt of the request, of the measures taken following the data subject's request regarding the exercise of the rights set forth in this information. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months.

The Data Controller shall inform the data subject of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request. If the data subject submitted the request electronically, the information will be provided electronically, if possible, unless the data subject requests otherwise.

If the Data Controller does not take measures following the data subject's request, it shall inform the data subject without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action, and of the fact that the data subject may file a complaint with a supervisory authority and exercise his right to judicial redress.

The Data Controller provides the requested information and information free of charge, provided that to the extent that the data subject's request is clearly unfounded or - especially due to its repetitive nature - excessive, the Data Controller may charge a reasonable fee for the administrative costs associated with providing the requested information or information or taking the requested action, or you can refuse to take action based on the request.

The Data Controller informs all recipients of all corrections, deletions or data management restrictions carried out by it, to whom or to whom the personal data was communicated, unless this proves to be impossible or requires a disproportionately large effort. At the request of the data subject, the Data Controller informs about these recipients.

## 10. DATA PROCESSING

The Data Controller uses the Data Processor named in this Notice to carry out its activities. The Data Processor does not make an independent decision, it is only entitled to act according to the contract concluded with the Data Controller and the instructions received. The Data Controller checks the work of the Data Processor. The Data Processor is entitled to use additional data processors only with the prior written consent of the Data Controller.

Data Processor What personal data does he have access to? How can he use the given personal data (what activities do he perform for the Data Controller)? How long can he store the data?

**Data processors**

**1. Oxford One Zrt.,** 1039 Budapest, Csetz J. u. 48-50, 13-09-221225

In what way can you use the given personal data (what activities do you perform for the Data Controller)? Operation of the website, general IT expert activity

How long can you store the data? Open-ended service contract - until the contract is terminated

**2. UNAS Online Kft.,** 9400 Sopron, Kőszegi út 14, 14114113-3-08

In what way can you use the given personal data (what activities do you perform for the Data Controller)? Storage and webshop engine service

How long can you store the data? Open-ended service contract - until the contract is terminated

**3. ANGYAL-TAX Limited Liability Company,** 2040 Budaörs, Árok utca 5., 13-09-151316

In what way can you use the given personal data (what activities do you perform for the Data Controller)? accounting, auditing, tax

expert activities, bookkeeping

How long can you store the data? until the termination of the contract, until the existence of a legal document retention obligation

**4. DPD Hungary Kft.,** 1134 Budapest Váci út 33, Building II. floor, 01-09-888141

In what way can you use the given personal data (what activities do you perform for the Data Controller)? forwarding

How long can you store the data? until the termination of the contract, until the existence of a legal document retention obligation

**5. Barion Payment Inc.,** Budapest, Irinyi József u. 4-20, 1117, 01-10-048552

In what way can you use the given personal data (what activities do you perform for the Data Controller)? online bank card payment

How long can you store the data? until the termination of the contract, until the existence of a legal document retention obligation

## 11. PERSONAL DATA RELATING TO CHILDREN AND THIRD PARTIES

Persons under the age of 16 may not provide personal information about themselves, unless permission has been requested from the person exercising parental supervision. By providing personal data to the Data Controller, you declare and guarantee that you act in accordance with the above, and your ability to act in relation to the provision of information is not limited.

If you are not legally entitled to provide any personal data on your own, you must either obtain the consent of the affected third parties (e.g. legal representative, guardian, other person - for example, a consumer - on whose behalf you are acting) or provide another legal basis for providing the data. In this context, you are obliged to consider whether the consent of a third party is necessary in connection with the provision of the given personal data. It may happen that the Data Controller does not come into personal contact with you, so you are obliged to ensure compliance with this point, and the Data Controller is not liable in this connection. Regardless, the Data Controller is always entitled to check whether the appropriate legal basis is available for the processing of personal data. For example, if you act on behalf of a third party - such as a consumer - we are entitled to request your authorization and/or the appropriate data management consent of the person concerned for the given case.

The Data Controller will do everything in its power to delete all personal data that has been made available to it without authorization. The Data Controller ensures that if it becomes aware of this, this personal data will not be forwarded to others, nor used by the Data Controller. If you become aware that a child or a third person has made personal data available to the Data Controller without authorization, please use the contact details specified in point 12.

## 12. CONTACT INFORMATION

If you have any questions or requests regarding your personal data stored in the system and data management, please send them to the e-mail address [info@imagineiovas.hu](mailto:info@imagineiovas.hu), or in writing to our postal address, Szentendrei u 19, 1035 Budapest. Please keep in mind that, in your interest, we are only able to provide information or take action regarding the handling of your personal data if you provide reliable proof of your identity.

We would like to inform you that the data subjects can contact the data protection officer of the Data Controller in all questions related to the management of their personal data and the exercise of their rights under the GDPR. Contact information of the data protection officer: Attila Zachár [zachar.attila@imagineiovas.hu](mailto:zachar.attila@imagineiovas.hu)

1. Your legal remedies:

a) The Data Controller can be contacted with any questions or comments related to data management at one of the contact details provided in this Information.

b) Investigation by notification to the National Data Protection and Freedom of Information Authority (address: 1530 Budapest, Pf.: 5., phone: +36 (1) 391-1400, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)) you can take the initiative by referring to the fact that you have suffered a violation of your personal data or there is a direct threat of such a violation; respectively

c) In case of violation of the data subject's rights, you can apply to the court against the Data Controller. The court acts out of sequence in the case. The Data Controller is obliged to prove that the data management complies with the provisions of the law. Adjudication of the lawsuit falls within the jurisdiction of the court. At the choice of the affected person, the lawsuit can be initiated before the court of the affected person's place of residence or residence.